FILED
U.S. DISTRICT COURT
EASTERN DISTRICT ARKANSAS
SEP 13 2021

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
SHERMAN DIVISION

SEALED By: D Brown DEP CLERK

UNITED STATES OF AMERICA §
§
v. §
§
JEROME OMEGA BOULDEN, JR. (1) §
a.k.a. "JayCash" §
ALVIN DAMON ARNOLD, JR. (2) §
ALCIDES MAURICE SCOTT (3) §
DEREK DEMOND CALHOUN, JR. (4) §
JACOB LAMAR EICHELBERGER, III (5) §
SKYLAH GLENN (7) §
TYVARIUS DAITRON TAYLOR (8) §
RONALD JAMES WILTZ (9) §
SHERMAN LEON BROWN (10) §
JATYRINE MARQUIS STEWART (11) §
DEVAUNCE LAKEITH LEWIS (12) §
DARION DEMON ANDERSON (13) §
BRANDON D'LON SMITTICK (14) §
DEIRA JATARY DAVIS (15) §
TAUREAN DION ARMSTRONG (16) §
JAWAUNE ANTONNE LEE (17) §
KAYLEN ELIZABETH TAYLOR (18) §
a.k.a. "KT" §
CIARRA CHESARAE THIBODEAUX (19) §
DAJONE RAHEEM JALEEL GENTRY (20) §
JANVIER LEIARON BRANCH (21) §
JOSHUA URIAH TISDALE (22) §
ASHLEY NICOLE WASHINGTON (23) §
ARSALAN BHANGDA (24) §
a.k.a. "Adam" §
ABDUL BASIT BHANGDA (25) §
JACQUELINE DANEANE QUINN (26) §
JASMINE HAILEY OMAR (27) §
EDWIN IGLESIAS (28) §
TIMOTHY JAMES LEACH (29) §
JACQUELINE MONTES (30) §
AUSTIN BROOKS YOUNG (31) §
GREGORY STEVEN TRENT §
a.k.a. "Ace" (32) §
EDDIE DONTE RODEN (33) §
RYESHAWN WILLIE DEVON GREEN §
a.k.a. "Peso" (34) §

No. 4:20-CR-382
Judge Jordan

ED of AR case #
4:21-MJ-235 ERE

FILED
AUG 11 2021
Clerk, U.S. District Court
Texas Eastern

TAMMY H. DOWNS, CL

CARY MARK THOMPSON (35) §
MICHELLE ESTEFANY SMITH (36) §
MARCUS ALLEN HARLSTON (37) §
JAMEL LAMAR RANKIN (38) §
BRENT R. JOHNSON (39) §
VICTOR G. YOUNGBLOOD (40) §
GREGORY DESHAUN WILKINS (41) §
RICHARD TODD SIMS (42) §
a.k.a. "Richy Rich" §
ZXERION DEOSIC LEE (43) §
DEANDRE JAMAL STATEN (44) §
SAMUEL GREGORY SHORTER, JR. (45) §
NATASHA LATRICE QUALLS (46) §
CHUKEDRICK D. TARVER (47) §
a.k.a. "Blacc" §
BRITTANY VICHELLE EDWARDS (48) §
LAQUAN DONTRIAL COOKS (49) §
a.k.a. "Midas" §
NICHOLAS MARCELLE CHANDLER §
a.k.a. "Brody" (50) §
DANTE THOMAS DEDDO (51) §
JORDAN RASHAD SELEXMAN §
a.k.a. "Fero" (52) §
SAMEER AHMED MOHAMMED (53) §
FARHAN NURUDDIN PARPIA (54) §
TRAVIS DONNELL MOORE (55) §
ROBERT DENTON WHITMIRE, JR. (56) §
MATTHEW DANIEL SMITH (57) §
JACQUELINE SUE HARDEE (58) §
DANIEL SHAPIR RASCOE (59) §
RAYANNA DAWN BYERS (60) §
KIEFFER JAMES BARCHETTI (61) §
KAMIE TAYLOR JASINSKI (62) §
JUNIOR PORFIRIO NEPOMUCENO-HIERRO §
(63) §
CESAR AUGUSTO REYES (64) §
DARIUS GRANT WHITLOW (65) §
JIBRAN KHALIL (66) §
MOHAMED TAHIRI (67) §
a.k.a. "Simo" §
PATRICK LYDELL SIMMONS (68) §
MARYANN E. SIMMONS (69) §
PRESTON PATRICK SIMMONS (70) §
CAMERON PATRICK SIMMONS (71) §
LAUREN ASHLEY ELIZABETH SIMMONS §
(72) §

DEXTER LENNER CALDWELL (73) §
KEREN VARGAS-GUTIERREZ (74) §
EDWARD VONAL SIMMONS (75) §
SABASTIAN DOMINIQUE BLAY (76) §
CAREY WATKINS, JR. (77) §
MICHAEL DIMIETRI REEVES (78) §
JOSHUA TAPIA (79) §
MICHAEL JOSEPH SAVATTERE (80) §
AASHISH BHUSAL (81) §
MALIK SALAMEH (82) §
a.k.a. "Blue" §
MOHAMMAD W. SALAMEH (83) §
a.k.a. "Moe" §
FERAS MAHMOD OBEIDAT (84) §
ALI ANWAR (85) §
ABDULLAH ANWAR (86) §
AVAZ KARIMOV (87) §
CLIFFORD JEROME SMITH (88) §
SHAHRUKH RAZZAK (89) §
JOSEPH DELANY COOPER (90) §
ARTURO GONZALEZ (91) §
EULISES ISIDRO TAVAREZ (92) §
NANSELLYS CRESPO-RIOS (93) §
RUBEN SANTANA-POLANCO (94) §
JORDAN MINH NGUYEN (95) §
a.k.a. "Toan" §
IONEL STANESCU (96) §
ANA MARIE STANESCU (97) §
IONUT ANTONIE (98) §
ELENA IRINA ANTONIE (99) §
MARIAN ALEXANDRU FIRU (100) §
DAVID CONSTANIN (101) §
COSTEL STANESCU (102) §

THIRD SUPERSEDING INDICTMENT

THE UNITED STATES GRAND JURY CHARGES:

At all times material to this Third Superseding Indictment:

INTRODUCTION

1. **RJ Telecom** and its related entities exported nearly $100 million worth of Apple and Samsung products into the United Arab Emirates ("U.A.E".) and Hong Kong grey markets.

Its executives paid others who stole most of these electronics through acts of robbery, fraud, or theft.

2. The grey market avoids formal distribution channels. This allows companies like **RJ Telecom** to sell stolen products abroad. Often, these trafficked devices include new Apple and Samsung electronics (e.g., phones tablets, laptops, smart watches, and other personal electronic devices, hereafter "devices") that are illicitly obtained in the United States and exported to foreign countries like the U.A.E. and Hong Kong. There, foreign entities sell these new devices in those and other countries to an end consumer. Typically, Apple or Samsung sell their new products to authorized distributors, like AT&T and T-Mobile, or big box retailers, like Walmart and Best Buy.

DEFINITIONS

3. At all times material for this Third Superseding Indictment the following definitions apply:

4. Exporter: An entity or person shipping new devices to foreign based importers for resale. **RJ Telecom** uses interstate carriers like FedEx to ship new devices to import countries such as the U.A.E. and Hong Kong. An Exporter like **RJ Telecom** is referred to as an "aggregator", or an entity that purchases new devices from numerous different sources of supply to operate in volume.

5. Supplier: An entity that purchases new devices from its own Device Traffickers and sells to **RJ Telecom.** Some Suppliers also ship new devices directly to the same or different foreign importers.

6. Device Traffickers: A person, or group of persons, illicitly obtaining new devices through various types of criminal activity such as fraud, identity theft, robbery, and theft. An

Organizer is a person within a Device Trafficking Organization ("DTO") who organizes, instructs, coordinates, or obtains devices from runners to then sell the devices to **RJ Telecom** or a Supplier, and thereafter pays the runners (defined below).

7. Runner: A person working within a DTO. The Runner is generally the individual physically obtaining the device within the store through fraud. The Runner is paid by the Organizer based on his/her activity.

8. Compromised employee: An employee of a retail store that is recruited to participate in the fraud or robbery. In fraud, the Compromised Employee generally activates new accounts or new cellular phone lines with stolen identities for a fee.

9. Plug: A Supplier that buys devices from Device Traffickers. The Plug usually deals with an Organizer. A plug can also be a compromised employee.

10. IMEI: The international mobile equipment identifier ("IMEI") is a unique identifier for a mobile handset or cellular device.

11. Unlocked Cell Phone: An unlocked cellphone will work with any network service provider. The unlocked cellphone will recognize a SIM card from any service provider. Mobile phone carriers typically offer subscribers a locked phone, essentially restricting its use to specific carriers and/or countries.

12. Locked Cell Phone: Network providers can lock a mobile phone by using a software setting that prevents the phone from accepting any subscriber identity module (SIM) except that associated with a particular carrier. The SIM is the microchip where subscriber data is stored, including the International Mobile Subscriber Identity information that is unique to every SIM and subscriber. Once a financed cell phone is paid off, or close to, the carrier will unlock the cell phone.

13. Blocklisted: The term "blocked[1]", is an IMEI reported as lost, stolen, faulty, broken, or fraudulently obtained. A company called Global Standard Mobilization Association ("GSMA") maintains a "Device Registry" of "blocklisted" devices for mobile carriers internationally. Subscribers to their Device Registry and services include AT&T, T-Mobile, and Verizon. The GSMA Device Registry allows operator members to share their own blocklisted devices to a global database to identify and block stolen devices across multiple networks and national borders. There are approximately 120 operators (mobile carriers) in 43 countries who use the device registry for blocking. Not included in that list is Armenia, China, Russia, India, Pakistan, Hong Kong, and the U.A.E.

14. New line activation fraud: Use of identity theft or other fraud to activate new accounts or cell phone lines with carriers such as AT&T, T-Mobile, or Verizon. The Organizer often recruits runners and provides them with stolen identities. The runner uses the stolen identity to activate a new account at a retail store and apply for credit to finance the purchase of new devices. If approved, the runner will pay the taxes, and possibly a small down payment depending on the credit. The taxes are generally paid with a prepaid debit card or cash. The Organizer will at times recruit a Compromised Employee. The Organizer will pay the employee to knowingly activate fraudulent new accounts or to add lines to an existing account in return for a fee. New line activation fraud allows **RJ Telecom**, Suppliers, and Device Traffickers to avoid the device from being quickly "blocklisted", and added to the GSMA Device Registry, as it normally takes around 30 days to miss the first finance payment, and for the mobile carrier to identify the fraud.

[1] The blocklist was formerly known as the "blacklist," or a device being "blacklisted."

15. Account takeover/account hijacking fraud: Use of identity theft to takeover the account of a legitimate customer to add new lines to the account, thus, obtaining new cell phone devices.

16. Break out fraud: A Device Trafficker or DTO will setup numerous shell companies, open business accounts with the carriers, and build credit for the businesses by paying the monthly bill. After building sufficient credit with the carrier, the group will then purchase a large number of cell phones for the "business" on credit, with the cost of each phone added to the monthly bill to be paid in installments. Depending on the carrier, at the time that the phones are added to the account, the taxes are paid, and possibly a small down payment may be required to physically take possession of the phones. The group then sells the cell phones to a Supplier and never makes full payment for the newly obtained devices.

17. SIM card swap fraud: A Device Trafficker will fraudulently obtain the identity and information of a legitimate customer. The Device Trafficker will call the telephone company asking to switch out the SIM card due to some issue. The telephone company will ask information about the legitimate customer that the Device Trafficker will correctly answer based on the stolen identity. Once the SIM card switch happens, the Device Trafficker will receive the legitimate customer's text messages, to include two step verifications for bank transactions. The Device Trafficker will then use the two-step verification to withdraw monies from the legitimate customer's bank account.

18. Jugging: A common term that describes a criminal activity to obtain property or U.S. currency. In this case, jugging is used to talk about obtaining devices.

19. Cash Out: A term used by Device Traffickers to describe getting cash from a plug (Supplier) for the illicitly obtained devices.

20. Financing: To obtain cellular devices with little to no upfront cost, the customer obtains financing through the cellular carriers. If credit is approved, the customer obtains a cell phone(s) by paying taxes, and if required, a small down payment based on credit, and pays off the phone during the typical two-year service agreement. Cellular carriers typically generate revenue solely from the cellular service over the two-year agreement. When new line activation fraud occurs, the cellular carrier is deprived of the cellular service revenue and fails to recoup the cell phone cost.

21. T-Mobile is a wireless network operator who sells cellular devices at T-Mobile or other retail stores throughout the United States, to include the Eastern District of Texas. Credit checks made at these retail store locations caused interstate wire transmission to be routed through one of FICOs computer servers located in either Chicago, Illinois or Shokapee, Minnesota; while electronic payment transactions run through either server in Snoqualmie, Washington or Dallas, Texas.

22. AT&T is a telecommunications company that also operates wireless networks and sells cellular devices at AT&T or other retail stores throughout the United States, to include the Eastern District of Texas. Credit reports and transactional payments made at these retail store locations caused interstate wire transmissions to be routed through one of AT&T's corporate computer servers located in either St. Louis, Missouri; Alpharetta, Missouri; or Fairfield, California.

23. Verizon is a wireless network operator who sells cellular devices at retail Verizon or other retail stores throughout the United States, to include the Eastern District of Texas. Credit reports made at these retail store locations caused interstate wire transmissions to be routed through one of Verizon's corporate computer servers located in Alpharetta, Georgia.

THE SCHEME

24. **RJ Telecom** bought stolen product from Device Traffickers or other similar companies (a.k.a. "Suppliers). These sources of supply allowed **RJ Telecom** to aggregate new devices for export to foreign import companies. The Device Traffickers stole electronics through fraud, robbery, or theft. Device Traffickers worked alone or as part of a criminal group. Some of them worked for warehouses, shipment companies, or authorized distributors. Others (like defendants one through fifteen), stole electronics by robbing authorized distributor stores and holding their workers at gun point. **RJ Telecom's** executives—**Arsalan Bhangda and Abdul Bhangda**—met with Device Traffickers in parking lots and at their physical store locations to exchange money for stolen devices. Device Traffickers also sold to other Suppliers, who then sold the devices to **RJ Telecom**.

25. Device Traffickers use several types of fraud to steal electronics. The first type is new line activation fraud. Device Traffickers recruit runners to open new accounts or cell phone lines with authorized distributors (like AT&T and T-Mobile). Runners open these accounts with stolen identities to finance the purchase. The runner uses cash or prepaid debit cards to pay the sales tax and setup a payment plan for the remaining balance. But the runner never pays on the account and instead sells the phone(s) to a company like **RJ Telecom**. The second type is account takeover/hijacking fraud. There, Device Traffickers stole identities to take over legitimate customer accounts. They got new devices by adding new lines to the account. The third type was break out fraud. Device Traffickers setup multiple shell business and built credit for each business by making small payments on a few devices. The shell companies bought several cell phones on credit, sold them to Suppliers, and stopped making payments. The last type was SIM Card Swap Fraud. There, Device Traffickers used the stolen identity and

information of a legitimate customer to call the customer's telephone company. Once on the phone, the Device Traffickers would ask for a new SIM card. With the new SIM card, the Device Traffickers could receive the legitimate customer's text messages, including messages with banking information. They used this information to withdraw money from the legitimate customer's account.

26. Theft from warehouses, distribution centers, or while property is in transit are also means in which Device Traffickers obtain devices.

27. **RJ Telecom** sold its stolen devices to companies in the U.A.E. and Hong Kong. It used FedEx for shipping. According to FedEx records, over 5,000 packages were shipped to U.A.E and Hong Kong companies, while **RJ Telecom** received approximately $90,500,000 from Dubai companies and $3,000,000 from Hong Kong companies.

BACKGROUND

1. In late October 2020, a series of armed takeover style robberies began at AT&T, T-Mobile, and Verizon retail cell phone stores. The goal of the robberies was to gain access to the store's safe and obtain new Apple iPhones. The armed robberies continued into early December 2020.

2. On or about December 9, 2020, the FBI and the Dallas Police Department ("DPD") arrested four members of the serial robbery crew following an armed takeover robbery of an AT&T cell phone store in Fort Worth: **Jerome Omega Boulden, Jr. a.k.a. "JayCash", Devonte Roberson, D.H.,** and **A.A.** They were arrested after leaving **Global One Wireless**, a cell phone store located at 2513 N. Fitzhugh Avenue, Suite 100, Dallas, Texas.

3. Hours later, a search warrant was executed at **Global One Wireless,** a related entity to **RJ Telecom**. The search found approximately 20 new Apple iPhone 12s stolen from the

AT&T store robbery earlier that night, new cell phones stolen from three other robberies committed by this serial robbery crew, and numerous other new cell phones and devices, some of which were seized. Also seized were computers used for the business, U.S. currency and other items.

4. The IMEIs for the cell phones seized from **Global One Wireless** were sent to AT&T, T-Mobile, and Verizon to determine how the devices were obtained. Numerous devices were stolen through fraud or theft.

5. The investigation expanded its focus to **Abdul Bhangda and Arsalan Bhangda,** the owners or operators of **Global One Wireless,** and other Device Traffickers and Suppliers.

6. As the investigation continued, it became a joint investigation with Homeland Security Investigations ("HSI"), United States Secret Service ("USSS"), United States Postal Inspection Service ("USPIS"), Texas Department of Public Safety ("DPS"), and other agencies.

7. The expanded investigative scope identified numerous Device Traffickers and Suppliers who directly supplied **RJ Telecom,** who in turn, exported many of these devices to *foreign importers.*

RJ TELECOM AND RELATED CORPORATE ENTITIES: THE EXPORTER

8. **Arsalan Bhangda and Abdul Bhangda** own or operate numerous active companies. The operations of each company[2] were focused on the purchase of new devices for export to the U.A.E. or Hong Kong based companies. The corporate entity **RJ Telecom** acted as the parent company corporation involved in the shipment and invoicing of new devices to foreign based companies. ***Abdul Bhangda and Arsalan Bhangda*** *are in control of each*

[2] Except for RJ Builders and Developers LLC, which appears to be a holding company to purchase property. The company was funded through proceeds from Hadi Wireless and Global One Wireless.

company and operate all companies as one company with the overall goal of obtaining new devices for resale in foreign markets. For these reasons, and simplicity, at all times in this indictment, all transactions, financial statements, shipping records and other activities for other **Abdul Bhangda and Arsalan Bhangda** related companies will be reflected as **RJ Telecom.**

9. **Arsalan Bhangda** was involved in maintaining the **RJ Telecom** business transactions, such as shipping, invoicing, accounts payable and receivable with Dubai and Suppliers. Less often, **Arsalan Bhangda** met and obtained devices from Device Traffickers.

10. **Abdul Basit Bhangda was** involved in operations, primarily the coordination, purchase, and payment for devices from Device Traffickers.

11. **Employees** worked at their two physical store locations. These employees met with Device Traffickers to obtain devices both in the store and various meeting locations within the city. The employees also recorded purchases of devices from Device Traffickers in Excel spreadsheets.

12. **RJ Telecom, Inc.** is an active and registered company in the State of Texas. **Arsalan Bhangda** is listed as an Officer[3] and the business has a registered office address of 12770 Coit Road, Suite 1260, Dallas, Texas. The assumed name is Smarttek Wireless. In bank records, **RJ Telecom** was described as an export company that purchased Apple and Samsung products and listed Dubai, U.A.E. as a market served.

13. **Rozi Wireless LLC** is an active and registered company in the State of Texas. **Abdul Bhangda** is listed as an Officer. The initial registered office was 811 S. Central Expressway, Richardson, Texas. As of March 2020, the listed address on the Texas Franchise

[3] For simplicity, the different positions (President, Director, Managing Member) listed on business documents, and the fact the titles are listed differently or change over time, positions will be referred to as "Officer."

Tax Public Information listed the mailing address for Rozi Wireless LLC as 12700 Coit Road, Suite 1260, Dallas, Texas.

14. **Hadi Wireless LLC** is an active and registered company in the State of Texas. Raheema Ashfaq, the wife of **Abdul Bhangda**, is a listed Officer and the business has a registered office address of 2513 N. Fitzhugh Avenue, Suite 100, Dallas, Texas.

15. **Global One Wireless LLC** is an active and registered company in the State of Texas. Tanaush Salim was originally listed as the Officer but was removed in 2019. **Arsalan Bhangda** is listed as an Officer and the business has a registered address of 955 W. President George Bush Highway, #1311, Richardson, Texas. The assumed name is **Global One Wireless.**

16. **Hadi Global Wireless LLC** is an active and registered company in the State of Texas. **Arsalan Bhangda** is listed as an Officer and the business has a registered office address of 1630 E. Lamar Boulevard, Suite 108, Arlington, Texas. The assumed name is **Global One Wireless**.

17. **Globalhub Wireless LLC** is an active and registered company in the State of Texas. Sarah Hanif and Tanaush Salim are listed as Officers and the business has a registered office address of 2513 N. Fitzhugh Avenue, Suite 100, Dallas, Texas.

18. **Sky Telecom Inc** is an active and registered company in the State of Texas. **Sameer Ahmed Mohammed** is listed as an Officer and the business has a registered office address of 6161 Savoy Drive, Suite 829, Houston, Texas. **Sky Telecom** has direct ties to **RJ Telecom** and is believed to be a Houston based company for **RJ Telecom**. **Sameer Ahmed Mohammed** also does business for **Gigabyte Trading LLC**.

19. **RJ Builder and Developers LLC** is an active and registered company in the State of Texas. **Abdul Bhangda** and Tanaush M. Salim are listed as Officers and the business has a registered office address of 12770 Coit Road, Suite 1260, Dallas, Texas.

20. **RJ Telecom** maintains an office at 12770 Coit Road, Suite 1260, Dallas, Texas. The building loading dock is used to receive deliveries from **Global One Wireless** and other Suppliers.

21. **RJ Telecom** has two physical store locations in the Dallas Metroplex. Each store appears to be in the business of selling cell phones and accessories, and in the purchase of consumer electronics. One store location is operated under the name **Global One Wireless** at 2513 N. Fitzhugh Avenue, Suite 100, Dallas, Texas. The store was used to facilitate the purchase of new devices from Device Traffickers. A common practice included one Device Trafficker in the store at a time while the front door remained locked. The second location for **Global One Wireless** is at 1630 E. Lamar Boulevard, Suite 108, Arlington, Texas.

22. **RJ Telecom** maintained records for the purchase of devices from Suppliers and Device Traffickers in Excel spreadsheets[4], generally titled something to the effect of "Daily Buyings…" The spreadsheets generally documented the date, IMEI, product description, carrier, condition, amount, and customer, as depicted in its original form below. The seized spreadsheets primarily captured purchases in 2019 and 2020, however, it is not believed to be a complete set of records or account for all business transactions in this time period. The FBI combined the spreadsheets into a master spreadsheet, hereinafter referred to as "**RJ Telecom** Daily Buyings".

[4] The spreadsheets were found in a computer seized from **Global One Wireless**, 2513 N. Fitzhugh Avenue, Dallas, Texas, on December 9, 2020.

DATE	IMEI	PRODUCT DESCRIPTION	CARRIER	Conditon	AMOUNT	CUSTOMER
7/1/2020	356729100590862	pixel 4xl 64gb black	att	sealed	300	micheal
7/1/2020	356729100598444	pixel 4xl 64gb black	att	sealed	300	micheal

23. From the **RJ Telecom** Daily Buyings, it appears from January 2019 to December 2020, **RJ Telecom** purchased over 70,000 devices and paid its Suppliers and Device Traffickers[5] around $47,750,000. There were approximately 1,450 devices purchased from Apple stores at a cost around $1,246,000[6]. From the **RJ Telecom** Daily Buying IMEIs, AT&T provided the approximate loss for the stolen devices was approximately $19,000,000[7].

24. From bank records in the approximate time frame of 2017 to 2021[8], **RJ Telecom** received approximately $93,530,000 from Xpress Logistics, Hanggroup Telecom, and other import companies. **RJ Telecom** paid its Suppliers listed in this indictment around $7,000,000; payments to all entities believed to be Suppliers was around $24,600,000. Many of these payments were in the form of wire transfer and check. **RJ Telecom** withdrew approximately $47,790,882[9] in U.S. currency. Device Traffickers were commonly paid with U.S. currency, but payment remitter services such as Zelle or CashApp were used as well. The **RJ Telecom** point of sales revenue was approximately $467,541 from December 2019 to February 2021; and their finance revenue was approximately $617,769 from February 2020 to March 2021.

[5] This includes Suppliers and Device Traffickers not listed in this indictment.
[6] The Apple store purchases were subtracted from the overall Supplier and Device Trafficker dollar amount.
[7] AT&T was sent the Daily Buying IMEIs and provided a preliminary analysis. Some of the fraud loss includes activations deemed first time non-pay, which is highly indicative of fraud. Requests sent to T-Mobile and Verizon are pending.
[8] At the time of this indictment, the Government has not obtained every bank record for RJ Telecom and its related entities, or its Suppliers, for the listed time period.
[9] While Device Traffickers were commonly paid in cash, the exact use cannot be confirmed.

THE FOREIGN IMPORT COMPANIES FOR RJ TELECOM

25. **Xpress Logistics FZCO** is in the Dubai airport free zone, Dubai, U.A.E. and **Hanggroup Telecom Limited** is in Kowloon, Hong Kong. Both companies import shipments from **RJ Telecom**.

26. **Interstellar General Trading L.L.C. ("Interstellar")** is a Dubai based company that purchases devices from **RJ Telecom** and its related entities. **Interstellar** appears to be associated with numerous United States based companies to include **RJ Telecom, Rozi Wireless, SCS Supply Chain Solutions, and MS Blue Trading.**

27. Other Dubai based companies invoiced by **RJ Telecom** who ultimately purchase the shipments received by importers like Xpress Logistics, include Ziyantec Electronics Trading L.L.C. ("Ziyantec"), Grand Famous Trading Phones LLC ("Grand Famous"), and Blue Orbit Mobile Phones Trading LLC ("Blue Orbit").

28. The Dubai based import companies appear to act as a third-party intermediary who receive shipments and remit payments for the Dubai based companies like Ziyantech to **RJ Telecom**.

THE SUPPLIERS FOR RJ TELECOM

29. **CellFlex LLC** has a registered address of 13507 Eldridge Villa Street, Sugarland, Texas. The listed Officer is **Farhan Nuruddin Parpia ("Farhan Parpia"). CellFlex LLC** also uses an office located at 6161 Savoy Drive, Suite 1123, Houston, Texas. **Farhan Parpia** purchased from Device Traffickers in Houston and Dallas.

30. **Am-Pak Cellular Inc** had a registered office address of 324 Maple Street, Richardson, Texas. The assumed name was Cell Phone Repair. The listed Officer was **Jibran Khalil**.

31. **Kenzo Group Inc** is registered to 9030 Southwestern Boulevard, Apartment 3124, Dallas, Texas. The listed Officer is **Mohamed Tahiri. JAD Electronics LLC** is a second company registered to **Mohamed Tahiri, a.k.a. "Simo"**, listed as the Officer. **Morockn corp** is a third company registered to **Mohamed Tahiri**, with a street address of 521 J Place, Suite 621, Plano, Texas. **Tahiri** currently conducts business on behalf of his entities at his residence located at 100 Ventura Court, Allen, Texas, within the Eastern District of Texas.

32. **Cellphonexchange L L C** is an active and registered company in the State of Texas. The listed Officer is **Michael Joseph Savattere** with a registered address of 3345 Broadway Boulevard, Suite 105, Garland, Texas.

33. **MS Blue Trading Inc** has a registered office address of 3030 Hester Avenue, Apartment 403, Dallas, Texas. The Officer is **Malik Salameh a.k.a. "Blue".** The assumed business name is Blue Wireless Repair and the entity's principal office address and the physical store location is 326 W. Jefferson Boulevard, Suite 326, Dallas, Texas. **Mohammad W. Salameh** works at the physical store location for Blue Wireless Repair. **I Blue Global Trading LLC** was a former company registered to **Malik Salameh. Moe Pro LLC** was a former company registered to **Mohammad W. Salameh** at the address of 10300 N. Central Expressway, Suite 354, Dallas, Texas. The business was terminated in January 2021.

34. **SCS Supply Chain** has a registered office address of 14292 Gillis Road, Farmers Branch, Texas. Saad Aziz is the listed Officer. **SCS Supply Chain LLC** formerly conducted business as Smart Cellular Solutions LLC. **SCS Supply Chain LLC** is associated with Interstellar. Smart Cellular Solutions was listed as a major supplier in bank paperwork for **RJ Telecom.**

35. **Gizmobile Inc** operates under the three DBAs of Gizmobile 1, Gizmobile 2 and Gizmobile 3. The listed Officer is Maaz Aziz. **Gizmobile 1** is a physical store location at 5441 Alpha Road, Suite 110, Dallas, Texas tied to **SCS Supply Chain**. The Manager of **Gizmobile 1** is **Feras Mahmod Obeidat**.

36. **Dawn Wireless LLC is** registered to 3013 Blue Wood Drive, Rowlett, Texas. The principal business name and address is Dawn Wireless at 3012 Big Town Boulevard Mesquite, Texas. The original listed Officers were FNU ALI and FNU ABDULLAH[10], known as **Ali Anwar and Abdullah Anwar**. An amended filing removed **Abdullah Anwar** from the company formation. **Dawn Trading LLC** is registered to 950 Green Pond Drive, Garland, Texas. The listed officer is **Abdullah Anwar. Dawn Trading LLC** has a second dba of Dawn Cell Phones registered to 3013 Blue Wood Drive, Rowlett, Texas. There are **Dawn Wireless** locations at 5425 N. Jim Miller Road, Dallas, Texas and at 3012 Big Town Boulevard Mesquite, Texas.

37. **UZ Global Inc** has a registered office address of 3801 W. Spring Creek Parkway, Apartment 2214, Plano, Texas. The listed Officer is **Avaz Karimov. Pyramid Moving, Inc.** is registered to **Avaz Karimov** as of May 2020.

38. **SR Cell LLC** has a registered office address of 17134 Ardisia Drive, Pflugerville, Texas. The Officer is **Shahrukh Razzak**. SRAZZAK INVESTMENTS LLC is a second company registered to **Shahrukh Razzak**. The registered office address is 1609 Purple Iris Lane, Pflugerville, Texas.

39. **Best Cell Phones LLC** is an active and registered company in the State of Texas. The Officer is **Eulises Tavarez** with a registered address of 205 Libra Drive, Killeen, Texas.

[10] Actual names listed on Texas Secretary of State records.

NCR Wholesale LLC is a registered and active company in the State of Texas with its officer as **Nansellys Crespo-Rios** located at 1803 Standridge St, Kileen, Texas.

40. **J N Wireless Express LLC** has a registered office address of 5417 Harbour Road, Richardson, Texas. The listed Officer is **Jordan Minh Nguyen a.k.a. "Toan"**, and the store location is at 4750 North Jupiter Road, Suite 122, Garland, Texas.

RJ TELECOM AND ITS DEVICE TRAFFICKERS

41. **RJ Telecom** purchased devices directly from its own Device Traffickers. **Arsalan Bhangda and Abdul Bhangda** and their employees met with their Device Traffickers in public locations such as gas stations, bank parking lots, or other areas. They also used their store **Global One Wireless** to conduct transactions with its Device Traffickers. **RJ Telecom** purchased devices from **Jerome Omega Boulden, Jr. a.k.a. "JayCash"**, from some of the robberies listed below in **Count One.** The Device Traffickers who obtained devices through fraud and theft and then sold those devices to **RJ Telecom** and its Suppliers are more fully described in **Count Four.**

Count One

Violation: 18 U.S.C. §§ 1951(a) and 2 (Conspiracy to Interfere with Interstate Commerce by Robbery, Aiding and Abetting)

THE CONSPIRACY

From in or around December 2019, and continuing through, on or about December 22, 2020, in the Eastern District of Texas and elsewhere, **Jerome Omega Boulden, Jr., a.k.a. "JayCash", Alvin Damon Arnold, Jr., Alcides Maurice Scott, Derek Demond Calhoun, Jr., Jacob Lamar Eichelberger, III, Devonte Keshan Roberson, D.H., A.A., Skylah Glenn, Tyvarius Daitron Taylor, Ronald James Wiltz, Sherman Leon Brown,**

Jatyrine Marquis Stewart, Devaunce Lakeith Lewis, Darion Demon Anderson, Brandon D'Lon Smittick, Deira Jatary Davis, L.P., S.W., A.H., D.S., J.R., Jibran Khalil, and Abdul Bhangda (hereafter **Count One defendants**), the defendants, did knowingly, intentionally and unlawfully combine, conspire, confederate, and agree together and with each other, and other persons known and unknown to the Grand Jury, to commit a certain offense against the United States, to wit: to obstruct, delay, affect or interfere with commerce by robbery or threats of physical violence to person(s) in furtherance of a plan to obstruct, delay or affect commerce, in violation of 18 U.S.C. §§1951(a).

OBJECT OF THE CONSPIRACY

The object of the conspiracy was to unlawfully take and obtain property, primarily consisting that of cellular telephones and cellular telephone accessories, from the businesses, persons and in the presence of employees, owners, and agents of businesses against their will by means of actual and threatened force, violence, and fear of immediate injury to their persons and property.

MANNER AND MEANS

1. It was part of the conspiracy that the **Count One defendants**, and other persons known and unknown to the Grand Jury, discussed and planned with each other, among other things, one or more of the following offenses (times and loss amount are estimates):

#	Date	Time	Offense Address	Loss[11]
1	01/12/2019	7:20 P.M.	AT&T, 8520 Abrams Road, Dallas, Texas	$42,939.00
2	02/22/2019	3:05 P.M.	11722 Marsh Lane, Dallas, Texas	$11,688.00
3	02/28/2019	7:04 P.M.	AT&T, 4271 FM2181, Suite 300, Corinth, Texas	Arrest
4	7/29/2020	3:21 P.M.	AT&T[12], 11939 Lake June Road, Balch Springs, Texas	$11,250.00
5	10/29/2020	2:25 P.M.	AT&T, 11722 Marsh Lane, Dallas, Texas	Attempt/ No Loss
6	11/12/2020	12:40 P.M.	AT&T, 344 North Highway 175, Seagoville, Texas	$9,850
7	11/16/2020	7:54 P.M.	Metro by T-Mobile, 3740 W. Northwest Highway, Dallas, Texas	$25,423.48
8	11/18/2020	7:50 P.M.	AT&T, 6906 Wesley St, Greenville, Texas	$29,300.00
9	11/21/2020	3:48 P.M.	Verizon, 4717 Colleyville Boulevard, Colleyville, Texas	$27,999.88
10	11/23/2020	7:00 P.M.	Verizon, 2701 Cross Timbers Rd, Flower Mound, Texas	$34,766.15
11	11/24/2020	9:50 A.M.	AT&T, 6906 Wesley St, Greenville, Texas	$63,939.00
12	11/28/2020	5:25 P.M.	Verizon, 2360 West Camp Wisdom Road, Grand Prairie, Texas	$32,278.80
13	12/1/2020	1:00 P.M.	Verizon, 912 N Collins, Arlington, Texas	$26,648.07
14	12/1/2020	2:36 P.M.	Verizon, 4717 Colleyville Rd, Colleyville, Texas	$17,729.97
15	12/2/2020	7:20 P.M	Metro by T-Mobile, 2211 S. Beckley Avenue, Dallas, Texas	$10,179.77
16	12/7/2020	4:31 P.M.	T-Mobile, 5620 Lyndon B Johnson Freeway, Dallas, Texas	$31,114.60
17	12/8/2020	6:49 P.M.	AT&T, 2802 N. Shepherd Drive, Houston, Texas	$32,755.64
18	12/9/2020	5:48 P.M.	AT&T, 2813 W. Berry Street, Fort Worth Texas	$26,252.00
19	12/17/2020	12:30 P.M.	T-Mobile, 410 US Highway 175 N, Seagoville, Texas	$20,092.22
20	12/18/2020	7:10 P.M.	Metro by T-Mobile, 5935 Greenville Avenue, Dallas, Texas	$8,609.90
21	12/20/2020	5:55 P.M.	AT&T, 5521 Greenville Avenue, Dallas, Texas	$22,930
22	12/21/2020	2:17 P.M.	AT&T, 11939 Lake June Road, Balch Springs, Texas	$45,150
23	12/22/2020	1:44 P.M.	AT&T, 6226 Broadway Blvd Suite 140 Garland, Texas	Attempt/ No Loss
			Total:	**$520,716.71**

[11] The loss amounts are estimates and subject to change. Loss amounts may include estimations of the following: stolen United States currency, dollar loss for stolen property items such as cellular phones, lost sales due to the business being closed, items stolen from employees, expenditures for security guards or systems, paid time off, and other items.

[12] All carrier agent authorized dealers will be referred to as AT&T, T-Mobile, and Verizon for simplicity.

At all times during the course and scope of the conspiracy, the above-mentioned businesses conducted business in interstate commerce, and the conspiracy would have, and did, in any way or degree, obstruct, delay, and affect, and attempt to obstruct, delay, and affect, commerce as contemplated by 18 U.S.C. §1951(a).

2. It was further part of the conspiracy that the defendants, and others known and unknown, formulated a plan and agreement, which, among other things, included:

a. the acquisition of cellular telephones and accessories;

b. the acquisition of United States currency;

c. the identification and surveillance of cellular telephone stores in preparation of the robbery;

d. the acquisition of property for use in committing robbery;

e. the timing and means of transportation to commit robbery;

f. the roles of participation during the preparation for and commission of robbery;

g. plans to avoid detection and apprehension by law enforcement;

h. the sale of stolen property from the robbery

OVERT ACTS OF THE CONSPIRACY

To effect the object of the conspiracy, the **Count One defendants**, and other persons known and unknown to the Grand Jury, committed overt acts within the Eastern District of Texas, and elsewhere, including, but not limited to, the following:

1. On or about January 12, 2019, in Dallas, Texas, a location within the Northern District of Texas, **Komla Detsikou, Eric Parrish, LaMarcus Parrish, and Brandon Parrish** and other persons known and unknown to the Grand Jury, aided and abetted by each other, took

personal property, consisting of cellular telephones, from the persons against their will, by means of actual or threatened force, violence, and fear of injury to their person. They stole 52 new Apple cell phones and other electronic devices totaling approximately $41,600. The stolen property was sold to **Jibran Khalil,** who in turn, sold approximately 37 stolen new cell phones and watches to **RJ Telecom** for a total cost of approximately $34,640. The AT&T retail cost of these devices was approximately $39,093.

2. On or about February 22, 2019, in Dallas, Texas, a location in the Northern District of Texas, **Detsikou, Brandon Parrish, and others known and unknown,** and other persons known and unknown to the Grand Jury, aided and abetted by each other, took personal property, consisting of cellular telephones, from the persons against their will, by means of actual or threatened force, violence, and fear of injury to their person. They stole approximately 14 new Apple cell phones totaling approximately $11,688. The stolen property was sold to **Jibran Khalil,** who in turn, sold all 14 new Apple cell phones to **RJ Telecom** for $10,650.

3. On or about February 28, 2019, in Corinth, Texas, a location in the Eastern District of Texas, **Detsikou and Eric Parrish, and others known,** and other persons known and unknown to the Grand Jury, aided and abetted by each other, attempted to take personal property, consisting of cellular telephones, from the persons against their will, by means of actual or threatened force, violence, and fear of injury to their person. The robbery was thwarted by the FBI and Dallas Police Department prior to the robbery taking place.

4. On or about July 29, 2020, in Balch Springs, Texas, a location within the Northern District of Texas, **Jerome Omega Boulden, Jr., a.k.a. "JayCash", Alcides Maurice Scott, Tyvarius Daitron Taylor, Ronald James Wiltz, Sherman Leon Brown, A.H.,** and other persons known and unknown to the Grand Jury, aided and abetted by each other, took

personal property, consisting of cellular telephones, from the persons against their will, by means of actual or threatened force, violence, and fear of injury to their person. **Boulden** coordinated the sale with **Abdul Bhangda. Boulden and Tyvarius Taylor** sold the stolen cellular telephones at **Global One Wireless**, Dallas, Texas.

5. On or about October 29, 2020, in Dallas, Texas, a location within the Northern District of Texas, **Jerome Omega Boulden, Jr., a.k.a. "JayCash", D.H.,** and other persons known and unknown to the Grand Jury, aided and abetted by each other, attempted to take personal property, consisting of cellular telephones, from the persons against their will, by means of actual or threatened force, violence, and fear of injury to their person.

6. On or about November 12, 2020, in Seagoville, Texas, a location within the Northern District of Texas, **Devaunce Lakeith Lewis, D.H., J.R., A.A.,** and other persons known and unknown to the Grand Jury, aided and abetted by each other, took personal property, consisting of cellular telephones, from the persons against their will, by means of actual or threatened force, violence, and fear of injury to their person.

7. On or about November 16, 2020, in Dallas, Texas, a location within the Northern District of Texas, **Jerome Omega Boulden, Jr., a.k.a. "JayCash", Tyvarius Daitron Taylor, D.H., J.R., D.S.,** and other persons known and unknown to the Grand Jury, aided and abetted by each other, took personal property, consisting of cellular telephones, from the persons against their will, by means of actual or threatened force, violence, and fear of injury to their person. **Boulden and Tyvarius Taylor** sold some of the stolen cellular telephones to **Abdul Bhangda** at **Global One Wireless**, Dallas, Texas.

8. On or about November 18, 2020, in Greenville, Texas, a location within the Northern District of Texas, **Jerome Omega Boulden, Jr., a.k.a. "JayCash",**

Alvin Damon Arnold, Jr., Alcides Maurice Scott, Skylah Glenn, and other persons known and unknown to the Grand Jury, aided and abetted by each other, took personal property, consisting of cellular telephones, from the persons against their will, by means of actual or threatened force, violence, and fear of injury to their person.

9. On or about November 21, 2020, in Colleyville, Texas, a location within the Northern District of Texas, **Jerome Omega Boulden, Jr., a.k.a. "JayCash", Alcides Maurice Scott, Jacob Lamar Eichelberger, III,** and other persons known and unknown to the Grand Jury, aided and abetted by each other, took personal property, consisting of cellular telephones and other items, from the persons against their will, by means of actual or threatened force, violence, and fear of injury to their person. **Jerome Omega Boulden, Jr., a.k.a. "JayCash"** coordinated the sale of the stolen devices with **Abdul Bhangda** and sold at least some of the stolen devices to **Global One Wireless**, Dallas, Texas.

10. On or about November 23, 2020, in Flower Mound, Texas, a location within the Eastern District of Texas, **Jerome Omega Boulden, Jr., a.k.a. "JayCash", Alvin Damon Arnold, Jr., Alcides Maurice Scott, D.H., Devonte Keshan Roberson,** and other persons known and unknown to the Grand Jury, aided and abetted by each other, took personal property, consisting of United States currency and cellular telephones, from the persons against their will, by means of actual or threatened force, violence, and fear of injury to their person. **Jerome Omega Boulden, Jr., a.k.a. "JayCash",** coordinated the sale of the stolen devices with **Abdul Bhangda** and sold at least some of them at **Global One Wireless**, Dallas, Texas.

11. On or about November 24, 2020, in Greenville, Texas, a location within the Northern District of Texas, **Jerome Omega Boulden, Jr., a.k.a. "JayCash", Alvin Damon Arnold, Jr., Alcides Maurice Scott, Skylah Glenn, Tyvarius Daitron Taylor,** and other

persons known and unknown to the Grand Jury, aided and abetted by each other, took personal property, consisting of cellular telephones, from the persons against their will, by means of actual or threatened force, violence, and fear of injury to their person.

12. On or about November 28, 2020, in Grand Prairie, Texas, a location within the Northern District of Texas, **Jerome Omega Boulden, Jr., a.k.a. "JayCash", D.H., Tyvarius Daitron Taylor,** and other persons known and unknown to the Grand Jury, aided and abetted by each other, took personal property, consisting of cellular telephones, from the persons against their will, by means of actual or threatened force, violence, and fear of injury to their person. **Boulden** sold some of the devices to **Global One Wireless**, Dallas, Texas.

13. On or about December 1, 2020, in Arlington, Texas, a location within the Northern District of Texas, **Jerome Omega Boulden, Jr., a.k.a. "JayCash", Darion Demon Anderson, D.H.,** and other persons known and unknown to the Grand Jury, aided and abetted by each other, took personal property, consisting of cellular telephones and other items, from the persons against their will, by means of actual or threatened force, violence, and fear of injury to their person. **Boulden** coordinated the sale of the stolen devices with **Abdul Bhangda** and sold at least some of the devices at **Global One Wireless**, Dallas, Texas.

14. On or about December 1, 2020, in Colleyville, Texas, a location within the Northern District of Texas, **Jerome Omega Boulden, Jr., a.k.a. "JayCash", Darion Demon Anderson, D.H.,** and other persons known and unknown to the Grand Jury, aided and abetted by each other, took personal property, consisting of cellular telephones and other items, from the persons against their will, by means of actual or threatened force, violence, and fear of injury to their person. **Boulden** coordinated the sale of the stolen devices with **Abdul Bhangda** and sold at least some of the devices at **Global One Wireless**, Dallas, Texas.

15. On or about December 2, 2020, in Dallas, Texas, a location within the Northern District of Texas, **Tyvarius Daitron Taylor,** and other persons known and unknown to the Grand Jury, aided and abetted by each other, took personal property, consisting of cellular telephones and other items, from the persons against their will, by means of actual or threatened force, violence, and fear of injury to their person.

16. On or about December 7, 2020, in Dallas, Texas, a location within the Northern District of Texas, **Tyvarius Daitron Taylor, Brandon D'Lon Smittick, J.R., and D.S.,** and other persons known and unknown to the Grand Jury, aided and abetted by each other, took personal property, consisting of cellular telephones and other items, from the persons against their will, by means of actual or threatened force, violence, and fear of injury to their person.

17. On or about December 8, 2020, in Houston, Texas, a location within the Southern District of Texas, **Jerome Omega Boulden, Jr., a.k.a. "JayCash", Derek Calhoun, D.H., Devonte Keshan Roberson,** and other persons known and unknown to the Grand Jury, aided and abetted by each other, took personal property, consisting of United States currency and cellular telephones, from the persons against their will, by means of actual or threatened force, violence, and fear of injury to their persons. **Boulden** coordinated the sale of the stolen cellular phones with **Abdul Bhangda** and sold the stolen cellular telephones for approximately $8,000 at **Global One Wireless**, Dallas, Texas.

18. On or about December 9, 2020, in Fort Worth, Texas, a location within the Northern District of Texas, **Jerome Omega Boulden, Jr., a.k.a. "JayCash", D.H., A.A., Devonte Keshan Roberson,** and other persons known and unknown to the Grand Jury, aided and abetted by each other, took personal property, consisting of cellular telephones and other items, from the persons against their will, by means of actual or threatened force, violence, and

fear of injury to their persons. **Boulden** coordinated the sale of the stolen cellular phones with **Abdul Bhangda** and sold the stolen cellular telephones for approximately $8,500 at **Global One Wireless**, Dallas, Texas.

19. On December 17, 2020, in Seagoville, Texas, a location within the Northern District of Texas, **D.H., Devaunce Lakeith Lewis,** and other persons known and unknown to the Grand Jury, aided and abetted by each other, attempted to take personal property, consisting of cellular telephones and other items, from the persons against their will, by means of actual or threatened force, violence, and fear of injury to their persons.

20. On December 18, 2020, in Dallas, Texas, a location within the Northern District of Texas, **D.H., Devaunce Lakeith Lewis,** and other persons known and unknown to the Grand Jury, aided and abetted by each other, attempted to take personal property, consisting of cellular telephones and other items, from the persons against their will, by means of actual or threatened force, violence, and fear of injury to their persons.

21. On December 20, 2020, in Dallas, Texas, a location within the Northern District of Texas, **D.H., Devaunce Lakeith Lewis,** and other persons known and unknown to the Grand Jury, aided and abetted by each other, attempted to take personal property, consisting of cellular telephones and other items, from the persons against their will, by means of actual or threatened force, violence, and fear of injury to their persons.

22. On December 21, 2020, in Balch Springs, Texas, a location within the Northern District of Texas, **D.H., Devaunce Lakeith Lewis,** and other persons known and unknown to the Grand Jury, aided and abetted by each other, attempted to take personal property, consisting of cellular telephones and other items, from the persons against their will, by means of actual or threatened force, violence, and fear of injury to their persons.

23. On December 22, 2020, in Garland, Texas, a location within the Northern District of Texas, **Devaunce Lakeith Lewis, D.H., Jatyrine Marquis Stewart, L.P., S.W.** and other persons known and unknown to the Grand Jury, aided and abetted by each other, attempted to take personal property, consisting of cellular telephones and other items, from the persons against their will, by means of actual or threatened force, violence, and fear of injury to their persons.

All in violation of 18 U.S.C. §§1951(a) and 2.

Count Two

Violation: 18 U.S.C. §§ 1951(a) and 2
(Interference with Commerce by Robbery)

On or about November 23, 2020 in Flower Mound, Texas, a location within the Eastern District of Texas, **Jerome Omega Boulden, Jr., a.k.a. "JayCash", Alvin Damon Arnold, Jr., Alcides Maurice Scott, and Abdul Bhangda,** the defendants, and other persons known and unknown to the Grand Jury, aiding and abetting one another, did unlawfully obstruct, delay, and affect, and attempt to obstruct, delay, and affect, commerce, as that term is defined in 18 U.S.C. § 1951, and the movement of articles and commodities in such commerce, by robbery, as that term is defined in 18 U.S.C. §1951, in that the defendants, aided and abetted each other, took personal property, consisting of United States currency and cellular telephones, from the persons against their will, by means of actual or threatened force, violence, and fear of injury to their person.

In violation of 18 U.S.C. §§ 195l(a) and 2.

Count Three

Violation: Violation of 18 U.S.C. §§ 924(c)(l)(A)(ii) and 2 (Using, Carrying, and Brandishing a Firearm During and in Relation to, and Possessing and Brandishing a Firearm in Furtherance of, a Crime of Violence)

On or about November 23, 2020 in Flower Mound, Texas, a location within the Eastern District of Texas, **Jerome Omega Boulden, Jr., a.k.a. "JayCash", Alvin Damon Arnold, Jr., Alcides Maurice Scott,** the defendants, aiding and abetting one another, did knowingly use, carry, and brandish a firearm, during and in relation to a crime of violence, namely, interference with commerce by robbery, in violation of 18 U.S.C. §§ 195l(a) and 2, as alleged in Count Two of this indictment, for which the defendants may be prosecuted in a court of the United States, and the defendants did knowingly possess and brandish said firearm in furtherance of the commission of that offense.

In violation of 18 U.S.C. §§ 924(c)(l)(A)(ii) and 2.

Count Four

Violation: Violation of 18 U.S.C. §§ 371 and 2314, and 2 (Conspiracy to transport stolen property in interstate (and foreign) commerce and aiding and abetting)

THE CONSPIRACY

From in or around January 2016, and continuing up to and including the date of the this indictment, the exact dates being unknown to the Grand Jury, in the Eastern District of Texas and elsewhere, **Jerome Omega Boulden, Jr., a.k.a. "JayCash", D.H., A.A., Alvin Damon Arnold, Jr., Alcides Maurice Scott, Derek Demond Calhoun, Jr., Jacob Lamar Eichelberger, III, Skylah Glenn, Tyvarius Daitron Taylor, Ronald James Wiltz, Sherman Leon Brown,**

Darion Demon Anderson, A.H., Taurean Dion Armstrong, Jawaune Antonne Lee, Kaylen Elizabeth Taylor, Ciarra Chesarae Thibodeaux, Dajone Raheem Jaleel Gentry, Janvier Leiaron Branch, Joshua Uriah Tisdale, Ashley Nicole Washington, Arsalan Bhangda a.k.a. "Adam", Abdul Basit Bhangda, Jacqueline Daneane Quinn, Jasmine Hailey Omar, Edwin Iglesias, Timothy James Leach, Jacqueline Montes, Austin Brooks Young, Gregory Steven Trent a.k.a. "Ace", Eddie Donte Roden, Ryeshawn Willie Devon Green a.k.a. "Peso", Cary Mark Thompson, Michelle Estefany Smith, Marcus Allen Harlston, Jamel Lamar Rankin, Brent R. Johnson, Victor G. Youngblood, Gregory Deshaun Wilkins, Richard Todd Sims a.k.a. "Richy Rich", Zxerion Deosic Lee, Deandre Jamal Staten, Samuel Gregory Shorter, Jr., Natasha Latrice Qualls, Chukedrick D. Tarver a.k.a. "Blacc", Brittany Vichelle Edwards, LaQuan Dontrial Cooks a.k.a. "Midas", Nicholas Marcelle Chandler a.k.a. "Brody", Dante Thomas Deddo, Jordan Rashad Selexman a.k.a. "Fero", Sameer Ahmed Mohammed, Farhan Nuruddin Parpia, Travis Donnell Moore, Robert Denton Whitmire, Jr., Jacqueline Sue Hardee, Daniel Shapir Rascoe, Rayanna Dawn Byers, Kieffer James Barchetti, Kamie Taylor Jasinski, Junior Porfirio Nepomuceno-Hierro, Cesar Augusto Reyes, Darius Grant Whitlow, Jibran Khalil, Mohamed Tahiri a.k.a. "Simo", Patrick Lydell Simmons, Maryann E. Simmons, Preston Patrick Simmons, Cameron Patrick Simmons, Lauren Ashley Elizabeth Simmons, Dexter Lenner Caldwell, Keren Vargas-Gutierrez, Edward Vonal Simmons, Sabastian Dominique Blay, Carey Watkins, Jr., Michael Dimietri Reeves, Joshua Tapia, Michael Joseph Savattere, Aashish Bhusal, Malik Salameh a.k.a. "Blue", Mohammad W. Salameh a.k.a. "Moe", Feras Mahmod Obeidat, Ali Anwar, Abdullah Anwar, Avaz Karimov, Clifford Jerome Smith, Shahrukh Razzak, Joseph Delany Cooper, Arturo Gonzalez, Eulises Isidro Tavarez, Nansellys Crespo-Rios,

Matthew Daniel Smith

Ruben Santana-Polanco, Jordan Minh Nguyen a.k.a. "Toan", Ionel Stanescu, Ana Marie Stanescu, Ionut Antonie, Elena Irina Antonie, Marian Alexandru Firu, David Constanin, and Costel Stanescu, the defendants (hereafter **"Count Four Defendants"**), did knowingly, intentionally and unlawfully combine, conspire, confederate, and agree together and with each other, and others persons known and unknown to the Grand Jury, to commit certain offenses against the United States, to wit: conspiracy to transport, transmit, or transfer in interstate commerce or foreign commerce any goods, wares, merchandise, securities or money of the value of $5,000 or more, knowing the same to have been stolen, converted or taken by fraud, and aiding and abetting, in violation of 18 U.S.C. §§ 371 and 2314, and 2.

OBJECT OF THE CONSPIRACY

The object of the conspiracy was to unlawfully take and obtain property, primarily consisting that of cellular phone devices, laptops, tablets, watches and other electronic devices from retail stores, warehouses, or shipments through interstate carriers, through various means such as robbery, theft, or fraudulent purchases. The fraudulent purchases or robberies took place in the Eastern District of Texas and elsewhere, to include other states, and at times was transported from other states in and through the Eastern District of Texas. The property was sold to **RJ Telecom** and its various Suppliers as listed above. The new devices were routinely shipped, to include stolen devices, in foreign commerce, to foreign import companies like Xpress Logistics in Dubai, U.A.E., and Hanggroup Telecom Limited in Hong Kong. The Device Traffickers and Suppliers for **RJ Telecom** also sent shipments in interstate commerce, and some Suppliers sent shipments in foreign commerce.

MANNER AND MEANS

1. It was part of the conspiracy that the **Count Four Defendants,** the defendants, and other persons known and unknown to the Grand Jury, discussed and planned with each other, among other things, the plan to obtain and sell stolen property, namely new devices, and sell to **RJ Telecom** and other Suppliers, who in turn, ultimately shipped to foreign based companies in the U.A.E. and Hong Kong.

2. It was further part of the conspiracy that the defendants, and others known and unknown, formulated a plan and agreement, which, among other things, included:

a. the acquisition of fraudulent identification documents to include driver's licenses, social security cards, and/or credit or debit cards;

b. to recruit individuals to travel to retail stores to use the fraudulent documents to purchase electronic devices, to include cell phones, tablets, watches, and laptops.

c. to recruit employees of retail stores to assist in the sale of new devices new line activation fraud (identity theft), sim card swap or other fraud or theft

d. to identify and travel to retail stores in the Dallas metroplex and elsewhere, to include other areas within and outside of Texas.

e. to fraudulently purchase the electronic devices at these retail stores in the Eastern District of Texas and elsewhere.

f. to steal by theft new devices from warehouses or distribution centers.

g. in relation to stolen property obtained through robbery, the allegations contained in Count One under Manner and Means, Paragraph Two, are hereby incorporated through reference as though set forth in full herein.

h. to transport or ship stolen property located outside the State of Texas across state lines, or transport or ship stolen property from within Texas to the Dallas, Texas area.

i. to ultimately transport and sell the stolen property.

j. to purchase the new devices from Device Traffickers.

k. to pay with U.S. currency, wire transfer, check, and other remitter services.

l. to send shipments of stolen new devices to foreign import companies.

m. to receive payment from the foreign import companies via wire transfer.

n. to regularly engage in interstate and foreign commerce.

OVERT ACTS OF THE CONSPIRACY

To effect the object of this conspiracy, **the Count Four Defendants,** and other persons known and unknown to the Grand Jury, committed overt acts within the Eastern District of Texas, and elsewhere, including, but not limited to, the following:

RJ TELECOM: EXPORTER

1. The overall goal of **RJ Telecom, Inc.** was to obtain new devices in aggregate for export to the U.A.E. and Hong Kong. **RJ Telecom** purchased new devices from Device Traffickers and Suppliers. The new devices were exported through interstate carrier shipments to foreign importers. Subpoenaed records and information found from the **Global One Wireless** search warrant showed numerous devices were shipped in interstate and foreign commerce. The foreign importers remitted payment by wire transfer back to bank accounts for **RJ Telecom.**

2. In February 2020, an individual messaged **Abdul Bhangda**, "The iPhone 11" "Blacklisted phones get used all the time", to which **Abdul Bhangda** responded, "It can not get

unlock ma'am". The individual asked, "Why would you buy it if it don't unlock", to which **Abdul Bhangda** responded, "Cause i can sell it in overseas".

I. RJ TELECOM AND ITS DEVICE TRAFFICKERS

The Jerome Boulden Robbery Group and Other Robbery Groups (Robbery)

3. The allegations contained in the Overt Acts of Count One of this Third Superseding Indictment are incorporated by reference as though set forth in full herein.

4. On or about December 24, 2019, robbers stole approximately 37 new Apple and Samsung cell phones and devices totaling approximately $32,854 through the commission of an armed takeover robbery at an AT&T retail store in Arlington, Texas. In the **RJ Telecom** Daily Buyings, eight of the devices were purchased from "simo", or **Mohamed Tahiri a.k.a. "Simo",** and one of the devices was purchased from "TOAN", or **Jordan Minh Nguyen, a.k.a. "Toan".**

5. On or about January 28, 2020, unknown suspects stole approximately 75 new cell phones and other devices totaling approximately $60,000 through the commission of an armed takeover robbery at an AT&T retail store in Bridgeton, Missouri. Some of the electronic devices were found in the **RJ Telecom** Daily Buyings.

6. On or about July 29, 2020, **Jerome Omega Boulden, Jr., a.k.a. "JayCash", Alcides Maurice Scott, Tyvarius Daitron Taylor, Ronald James Wiltz, Sherman Leon Brown,** and **A.H.,** robbed at AT&T store in Balch Springs, Texas. **Boulden** coordinated the sale with **Abdul Bhangda.** The stolen property was then transported and sold to **Global One Wireless**, in Dallas, Texas.

7. On or about August 30, 2020, unknown suspects, stole approximately 17 Apple cell phones totaling approximately $10,449 through the commission of armed takeover robbery

at an AT&T retail store in Baytown, Texas. Some of the devices were found in the **RJ Telecom** Daily Buyings.

8. On or about October 21, 2020, robbers stole approximately 31 Apple cell phones and other devices totaling approximately $25,000 through the commission of armed takeover robbery at an AT&T retail store in Red Oak, Texas. Many of the devices were recovered by law enforcement. One device was found in the **RJ Telecom** Daily Buyings.

9. On or about November 16, 2020, **Jerome Omega Boulden, Jr., a.k.a. "JayCash", Tyvarius Daitron Taylor, D.H., J.R.,** and **D.S.,** robbed a T-Mobile store in Dallas, Texas. Afterwards, **Jerome Omega Boulden, Jr., a.k.a. "JayCash", and Tyvarius Daitron Taylor** sold the stolen cellular telephones to **Abdul Bhangda** at **Global One Wireless**, Dallas, Texas. Approximately five IMEIs from the robbery were found on the **RJ Telecom** Daily Buyings, under "shop", for a purchase price of $325. The retail cost of four cell phones was $1,199 and the fifth cell phone was $999.

10. On or about November 21, 2020, **Jerome Omega Boulden, Jr., a.k.a. "JayCash", Alcides Maurice Scott,** and **Jacob Lamar Eichelberger, III,** robbed a Verizon store in Colleyville, Texas. **Jerome Omega Boulden, Jr., a.k.a. "JayCash"** coordinated the sale of the stolen devices with **Abdul Bhangda** and sold at least some of the stolen devices to **Global One Wireless**, Dallas, Texas.

11. On or about November 23, 2020, **Jerome Omega Boulden, Jr., a.k.a. "JayCash", Alvin Damon Arnold, Jr., Alcides Maurice Scott, D.H.,** and **Devonte Keshan Roberson,** robbed a Verizon store in Flower Mound, Texas. **Boulden** coordinated the sale with **Abdul Bhangda.** The stolen property was then transported and sold at **Global One Wireless** in Dallas, Texas, who in turn, shipped some of the devices in interstate and foreign commerce.

12. On or about November 28, 2020, **Jerome Omega Boulden, Jr., a.k.a. "JayCash", D.H.,** and **Tyvarius Daitron Taylor,** robbed a Verizon store in Grand Prairie, Texas. **Boulden** sold some of the devices to **Global One Wireless**, Dallas, Texas.

13. On or about December 1, 2020, **Jerome Omega Boulden, Jr., a.k.a. "JayCash", Darion Demon Anderson,** and **D.H.,** robbed a Verizon store in Arlington, Texas. **Boulden** coordinated the sale of the stolen devices with **Abdul Bhangda** and sold at least some of the devices at **Global One Wireless**, Dallas, Texas.

14. On or about December 1, 2020, **Jerome Omega Boulden, Jr., a.k.a. "JayCash", Darion Demon Anderson,** and **D.H.,** robbed a store in Colleyville, Texas. **Boulden** coordinated the sale of the stolen devices with **Abdul Bhangda** and sold at least some of the devices at **Global One Wireless**, Dallas, Texas.

15. On or about December 8, 2020, **Jerome Omega Boulden, Jr., a.k.a. "JayCash", D.H., Devonte Keshan Roberson,** and **Derek Calhoun,** robbed an AT&T store in Houston, Texas. **Boulden** coordinated the sale with **Abdul Basit Bhangda.** The stolen property was then transported and sold for approximately $8,000 to **Global One Wireless** in Dallas, Texas.

16. On or about December 9, 2020, **Jerome Omega Boulden, Jr., a.k.a. "JayCash", D.H., A.A.,** and **Devonte Keshan Roberson,** robbed an AT&T store in Fort Worth, Texas. The stolen property was then transported and sold to **Global One Wireless** in Dallas, Texas. **Boulden** coordinated the sale of the stolen cellular phones with **Abdul Bhangda** and sold the stolen cellular telephones for approximately $8,500 at **Global One Wireless**, Dallas, Texas.

17. On or about December 9, 2020, a search warrant was conducted at **Global One Wireless** in Dallas, Texas. Devices stolen by **Boulden** and his crew were recovered from the robberies in Balch Springs on June 29, 2020, Colleyville on November 21, 2020, and in Flower

Mound on November 23, 2020, and the approximate 20 devices from the Fort Worth robbery, all described in paragraphs above. Also seized were devices sold by Device Trafficker **Taurean Armstrong.** Thus, these stolen devices were prevented from being shipped in interstate or foreign commerce.

Kaylen Elizabeth Taylor DTO – New Line Activation Fraud

18. **Kaylen Elizabeth Taylor, a.k.a. "KT"** conducted new line activation fraud. **Kaylen Taylor** traveled to Arkansas, California, and within Texas to obtain new cell phones using identity theft. **Kaylen Taylor** used runners and compromised employees working at telephone carriers like AT&T and T-Mobile to facilitate the transactions. **Kaylen Taylor** sold the new cell phones to **Arsalan Bhangda and Abdul Bhangda**. From January 2019 to December 2020, the **RJ Telecom** Daily Buyings listed approximately 897 devices for **Kaylen Taylor** totaling approximately $491,532. AT&T confirmed some devices were stolen. The runners and compromised employees used by **Kaylen Taylor** were:

19. Runners: **Ashley Nicole Washington, Ciarra Chesarae Thibodeaux, Dajone Raheem Jaleel Gentry, Janvier Leiaron Branch, Joshua Uriah Tisdale, and Jacqueline Daneane Quinn. Gregory Deshaun Wilkins**, a former Verizon call center employee, shipped a FedEx package on or about November 25, 2019 to **Kaylen Taylor. Wilkins** was also a runner for **Cary Mark Thompson**.

20. Employees: **Jasmine Hailey Omar** was a T-Mobile employee who facilitated new line activation fraud for **Kaylen Taylor** and **Quinn. Timothy James Leach, Edwin Iglesias, Jacqueline Montes, and Austin Brooks Young** were AT&T employees who facilitated new line activation for **Austin Young**.

21. On or about September 18, 2019, **Kaylen Elizabeth Taylor**, fraudulently purchased an electronic device valued at approximately $2,048.00 from Nebraska Furniture Mart in The Colony, Texas, a location within the Eastern District of Texas, and coordinated the sale of the new device with **Abdul Bhangda**.

22. On or about September 19, 2019, **Kaylen Taylor, Ciarra Chesarae Thibodeaux, Dajone Raheem Jaleel Gentry,** attempted to fraudulently purchase electronic devices totaling approximately $6,614.31 from Nebraska Furniture Mart in The Colony, Texas. The fraudulent transactions were prevented by Nebraska Furniture Mart internal security, and law enforcement was contacted. The fraudulent identification documents were recovered from the three defendants at the store location. The arrests prevented the sale of the stolen electronic devices to **Abdul Bhangda**, thus, preventing the electronic devices from being shipped in interstate or foreign commerce.

23. On or about December 9, 2019, **Kaylen Taylor, Jacqueline Daneane Quinn, and Jasmine Hailey Omar** engaged in new line activation fraud for the purchase of four Apple iPhones, two Apple watches, and accessories totaling approximately $7,394.78 from a T-Mobile retail store located at 3628 Frankford Road, Suite #225, Dallas, Texas, a location within the Eastern District of Texas. **Kaylen Taylor and Quinn** used fraudulent identities to purchase the new consumer electronics. **Jasmine Hailey Omar** was a T-Mobile employee recruited to fraudulently sell to **Kaylen Taylor and Quinn**. The **RJ Telecom** Daily Buyings found that **Kaylen Taylor** sold the new cell phones[13] to **Abdul Bhangda** for $620 with a T-Mobile cost of $999.99, and one Apple s5 40mm 4g watch for $300 with a T-Mobile cost of $499.99.

[13] One of the new stolen cell phones was obtained by theft. The iPhone was added to the fraudulently created account by Taylor but was never rang out by Omar. One Apple watch stolen through new line activation fraud was not found in the Daily Buyings.

24. On or about February 1, 2020, **Kaylen Taylor, Janvier Leiaron Branch, Joshua Uriah Tisdale, and Ashley Nicole Washington,** transported stolen property totaling over $8,000 from Arkansas, in and through the Eastern District of Texas, to Richardson, Texas, for the purpose of selling the stolen property to **Abdul Bhangda**. Former Verizon employee **Marcus Allen Harlston** activated numerous cell phones and other devices under three different identities tied to the seized devices from **Kaylen Taylor.** The individuals were arrested prior to the sale, and the stolen property and fraudulent identification documents were recovered by law enforcement, thus, preventing the stolen property from being shipped in foreign commerce. **Kaylen Taylor and Abdul Bhangda** had messaged each other to arrange a meeting at or near the time of their arrest, at the location of their arrest.

25. On or about March 5, 2020, **Edwin Iglesias** fraudulently activated eight lines through new line activation fraud. The activations took place between 10:11 a.m. and 10:58 a.m. Prior to this, **Kaylen Taylor** had telephonic contact with **Edwin Iglesias.** All eight devices were found to have been sold by **Kaylen Taylor** from the **RJ Telecom** Daily Buyings. The margin between price purchased by **RJ Telecom** and the retail cost for the devices was approximately $2,879. All eight devices were found by AT&T to receive international roaming notifications in China and Hong Kong.

26. On or about October 26, 2020, **Timothy James Leach** and **Edwin Iglesias** both fraudulently activated seven new lines using the same victim's identity over three different transactions. The tax for each transaction was paid with a credit card ending in 1471. The **RJ Telecom** Daily Buyings listed all seven devices were sold by **Kaylen Taylor** to **RJ Telecom for** $565 on the same day.

27. On or about March 25, 2021, an individual believed to be **Kaylen Taylor** met with **Abdul Bhangda** in the rear parking lot of a Dickey's BBQ business in Dallas, Texas, at approximately 10:18 p.m. After the meeting, **Kaylen Taylor** was observed in the business front parking lot exiting the driver's seat of the vehicle to place a bag from the rear passenger seat of the vehicle into the trunk.

28. On or about March 30, 2021, **Abdul Bhangda** and **Kaylen Taylor** separately departed **Global One Wireless** and met at a nearby gas station. **Abdul Bhangda** had arrived in his BMW but met with **Kaylen Taylor** in a Toyota Corolla at a nearby gas station. **Kaylen Taylor** was observed delivering a new Macbook box and a duffel bag to **Abdul Bhangda**. **Kaylen Taylor** then departed and **Abdul Bhangda** returned to **Global One Wireless**. The devices provided by **Kaylen Taylor** were eventually brought into **Global One Wireless.**

29. On or about May 30, 2021, **Kaylen Elizabeth Taylor** conducted new line activation fraud at an AT&T in Burleson, Texas, with AT&T employees **Leach and Austin Brooks Young** resulting in twelve stolen new iPhone 12. None of these devices were powered on or registered on AT&T's network in the Unites States. In June 2021, ten of the iPhone 12s had been activated in China or Hong Kong.

30. On or about June 6, 2021, **Kaylen Elizabeth Taylor** conducted new line activation fraud at an AT&T in Burleson, Texas, with former AT&T employees **Leach, Jacqueline Montes, and Austin Brooks Young** resulting in eight stolen new iPhone 12s, six stolen new Apple watches, and one stolen new Apple iPad. None of these devices were powered on or registered on AT&T's network in the Unites States. By June 16 or June 17, 2021, six of the eight iPhone 12s had been activated in China.

31. On or about June 13, 2021, **Kaylen Taylor** conducted new line activation fraud at a AT&T in Burleson, Texas, with AT&T employees **Leach and Montes** resulting in nine stolen new iPhone 12s. None of these devices were powered on or registered on AT&T's network in the Unites States. On June 19, 2021, four of these devices were powered on in China and international roaming notifications were received by AT&T.

32. The total loss to AT&T related to the referenced transactions involving **Leach, Montes, and Austin Brooks Young** was approximately $32,342.

Gregory Steven Trent a.k.a. "Ace"- Device Trafficker – ID Theft & New Line Activation

33. **Gregory Steven Trent** supplied stolen identities to Device Traffickers like **Kaylen Taylor,** and conducted new line activation fraud. **Eddie Donte Roden** was a Premium Retail employee who conducted fraudulent activations, to include activations for **Gregory Steven Trent.** From May 2018 to June 2020, the **RJ Telecom** Daily Buyings listed approximatley 219 devices for **Gregory Steven Trent** totaling approximately $167,170. AT&T confirmed some devices were stolen

34. From approximately February 2019 to September 4, 2019, **Eddie Donte Roden** sold approximately 407 cell phones, of which 272 were confirmed fraudulent transactions. A review of **Eddie Donte Roden's** cell phone found approximately 69 pieces of identifying information ("PII") belonging to 21 victims. **Eddie Donte Roden** obtained, or attempted to obtain, cellular phones by using the information from approximately 17 of these 21 victims.

35. On or about March 19, 2019, **Gregory Steven Trent** obtained three devices through new line activation fraud at a Wireless M Solutions store in Mansfield, Texas. The is the same Wireless M store related to the photograph of the business card sent by **Abdul Bhangda** to

Ryeshawn Green. The Wireless M Solutions employee who conducted the transactions was **Ashley Nicole Washington (defendant 23),** who was also a runner for **Kaylen Taylor.**

36. On or about May 12, 2019, **Gregory Steven Trent** text a screenshot to **Abdul Bhangda** of a conversation between **Gregory Steven Trent** and "KT Phones", or **Kaylen Taylor**. The screenshot showed **Gregory Steven Trent** sent, "So I gave u 3 faces on Monday and u only got 1 phone by Friday (angry emoji). **Kaylen Taylor** responded, "I need to get that white girl face with the short hair swapped them other ones been having probs they ain't been jugging I worked Trisha ID and got that phone she been working and shit". "Then I had a 5 phone play u told me to guess on questions??? Didn't get them correct at all failed". "I'm doing Verizon tomorrow my cousin go to work".

37. On or about July 18, 2019, **Gregory Steven Trent** text **Abdul Bhangda** with six IMEI numbers for Apple cell phones. The IMEIs resolved to fraud activations by Premium Retailer employee **Eddie Donte Roden** on or about July 13, 2019, July 16, 2019, and July 17, 2019. **Abdul Bhangda** confirmed **Gregory Steven Trent** was in Dallas and told **Gregory Steven Trent** to contact his bro there at 9729002550 **(Arsalan Bhangda).**

38. On or about May 14, 2020, a consent search by the Addison Police Department of **Gregory Steven Trent's** hotel room led to the discovery of Texas driver's licenses, twenty (20) credit cards, and five (5) social security account cards Also observed in the hotel room was counterfeiting materials to include numerous identifications, computers, printers, and scanners.

Ryeshawn Willie Devon Green a.k.a. "Peso" – Device Trafficker

39. **Ryeshawn Willie Devon Green a.k.a. "Peso"** conducted new line activation fraud. **Ryeshawn Green** had also conducted transactions with **Kaylen Taylor.** From May 2018

through December 2020, the **RJ Telecom** Daily Buyings listed approximatley 474 devices for **Ryeshawn Green** totaling approximately $313,881. AT&T confirmed some devices were stolen.

40. On or about March 13, 2019, **Abdul Bhangda** sent **Ryeshawn Green** the following messages: "2701 st highway 50 commerce tx 75428;" "This address for new walmart guy who just left from me;" "Whats in it for me lol finding all these plugs?" The address resolved to a Walmart in Commerce, Texas.

41. On or about March 25, 2019, **Ryeshawn Green** text **Abdul Bhangda,** ""Att 960", "256", "1100 256 iPad 12.9", which correlated to an entry on the Daily Buyings for "paiso" on March 25, 2019. The device was obtained by new line activation fraud.

42. On May 13, 2019, **Abdul Bhangda** via chat message provided a photograph of a business card to **Ryeshawn Green** of an employee at Wireless M Solutions, located in Mansfield, Texas. **Abdul Bhangda** sent **Ryeshawn Green** a screenshot of a conversation an individual who referred to himself as **"Adam"**, believed to be **Arsalan Bhangda**, and an unidentified individual who appears to be a Wireless M employee. Within the screenshot **Arsalan Bhangda** stated "Hey bro Paiso is going to call you take care of him he good". Later in the chat message, the unidentified individual replied "ok make sure he text me before he call cause if my manager around I won't answer thanks".

Cary Mark Thompson DTO – New Line Activation Fraud

43. **Cary Mark Thompson** conducted new line activation fraud in Arkansas. **Cary Thompson** provided compromised AT&T and Best Buy employees victim information to activate new lines and used runners to enter the stores and obtain the new cell phones. From approximately January 2019 to May 2020, the **RJ Telecom** Daily Buyings listed approximately

105 devices for **Cary Thompson** totaling approximately $78,379. AT&T confirmed some devices were stolen. The following were the Compromised Employees and Runners:

44. Employees: **Michelle Estefany Smith** was a Best Buy employee at store 222, 4229 E. McCain Boulevard, North Little Rock, Arkansas who activated around 26 devices through identity theft; **Jamel Lamar Rankin** was a Best Buy employee at store 222, 4229 E. McCain Boulevard, North Little Rock, Arkansas who activated around 22 devices through identity theft. **Marcus Allen Harlston** was a Best Buy employee at store 222, 4229 E. McCain Boulevard, North Little Rock, Arkansas, who activated around 48 devices through identity theft. **Harlston** later became a **Verizon** employee in Arkansas and activated devices for **Kaylen Taylor. Brent Johnson** was an AT&T employee working at a corporate store in North Little Rock, Arkansas, who fraudulently activated around 28 devices.

45. Runners: **Victor Youngblood** was a runner who entered the store and used his debit card to pay the taxes and receive the new cell phones obtained through identity theft from **Michelle Estefany Smith, Rankin, Harlston,** and **Brent Johnson.** It appeared **Victor Youngblood** also coordinated at least one shipment with **Cary Thompson. Gregory Deshaun Wilkins** was a runner who entered the store and used his debit card to pay the taxes and receive the new cell phones obtained through identity theft from **Michelle Estefany Smith and Harlston.**

46. On or about November 29, 2019, Best Buy employee **Harlston** activated two new lines using identity theft that resulted in two new cell phones. The cost of the two new cell phones were $1,249.99 and $1,099.00. The tax on the devices was paid with a debit card in the name of **Victor Youngblood.**

47. On or about December 2, 2019, a FedEx shipment believed to contain the two cell phones were sent under the name **Cary Thompson** from Little Rock, Arkansas under the **RJ Telecom** shipping label to 1565 N. Central Expressway, Richardson, Texas. The **RJ Telecom** Daily Buyings listed the price paid to **Cary Thompson** as $750 ($1,249.99) and $660 ($1,099). The two new stolen cell phones were included in an **RJ Telecom** invoice (number 124191051) dated December 4, 2019, in the amount of $120,900, shipped to Xpress Logistics in Dubai, U.A.E., and billed to Grand Famous Phones Trading LLC, Dubai, U.A.E. On or about December 4, 2019, a total of approximately three FedEx packages--under the shipper name **Arsalan Bhangda** for the shipper company **RJ Telecom--**were sent from a FedEx station at 1200 Capital Avenue, Plano, Texas, a location within the Eastern District of Texas, to Xpress Logistics in Dubai, U.A.E. Days later, a wire transfer originating in the U.A.E. was sent by Xpress Logistics to **RJ Telecom** in the amount of $120,870 for invoice number 124191051.

48. On or about December 12, 2019, Best Buy employee **Michelle Estefany Smith** fraudulently activated an account and one additional line for the victim S.G. that resulted in two new stolen Apple iPhone 11s that were picked up by **Gregory Wilkins. Wilkins** used a debit card in his name to pay the taxes. On the same day, AT&T employee **Brent R. Johnson** fraudulently activated two additional lines to the victim account for S.G resulting in two stolen Apple iPhone 11s, which were found in the **RJ Telecom** Daily Buyings under "**cary Thompson**". Four days later, **Michelle Estefany Smith** fraudulently activated two additional lines to the victim account for S.G. resulting in two stolen Apple iPhone 11s, which were found in the **RJ Telecom** Daily Buyings under "**cary thompson**". at prices of $820 and $900. The fraudulent cell phones activated by **Michelle Estefany Smith** were at a retail cost $1,099.99 and $1,149.99, respectively. **Cary Thompson** coordinated the sale with **Abdul Bhangda.**

49. On or about January 24, 2020, Best Buy employee **Jamel Rankin** activated three additional lines to the victim account for S.G. resulting in three stolen Apple iPhone 11s, which were found in the Daily Buyings under "Cary". Days later, **Rankin** activated two additional lines to the victim account for S.G. resulting in two stolen Apple iPhone 11s. In February 2020, a FedEx package was shipped under the name **Cary Thompson** believed to contain fraudulently obtained cell phones sold by **Rankin**, via FedEx under the **RJ Telecom** account, from Little Rock, Arkansas to 1565 N. Central Expressway, Richardson, Texas. The **RJ Telecom** Daily Buyings listed prices for three devices activated by **Rankin** at $600, $950, and $760, while the retail cost was $1,099.99, $1,249.99, and $1,249.99, respectively. **Cary Thompson** coordinated the sale with **Abdul Bhangda.**

50. On or about February 8, 2020, **Rankin** activated one new line that resulted in one stolen Apple iPhone 11 being picked up by **Youngblood**. The taxes were paid by a debit card in **Victor Youngblood's** name.

51. From approximately August 2018 through April 2020, approximately 113 packages believed to contain stolen new devices, were shipped under the name **Cary Thompson** via FedEx, under the **RJ Telecom** shipping account, from Arkansas, Pennsylvania, and Texarkana, Texas, a location within the Eastern District, to the Dallas, Texas area. Numerous packages were shipped to a FedEx station located at 1200 Capital Avenue, Plano, Texas, a location within the Eastern District of Texas. **Cary Thompson** coordinated sales with **Abdul Bhangda.**

Taurean Dion Armstrong a.k.a. "Rico" DTO – New Line Activation Fraud

52. **Taurean Armstrong a.k.a. "Rico"** conducted new line activation fraud. **Armstrong** and his runners traveled to Arkansas, Oklahoma and within Texas to obtain new cell

phones using identity theft. **Armstrong** purchased stolen identities and background reports from **Richard Todd Sims a.k.a. "Richy Rich"**. **Armstrong** coordinated and sold the new cell phones to **Arsalan Bhangda** and **Abdul Bhangda**. Runners used to conduct the new line activation fraud were **Jawaune Antonne Lee, Deandre Jamal Staten, Zxerion Deosic Lee**, and **Samuel Gregory Shorter, Jr.** From January 2019 to February 2020, the **RJ Telecom** Daily Buyings listed approximately 156 devices for **Armstrong** totaling approximately $114,383. AT&T confirmed some devices were stolen

53. On or about March 30, 2020 through on or about April 1, 2020, **Armstrong, Staten,** and **Shorter** transported approximately 18 stolen cell phones valued over $19,000 from Arkansas, and in and through the Eastern District Texas. **Armstrong** coordinated the sale with **Abdul Bhangda** and sold the stolen property to **RJ Telecom**. The **RJ Telecom** Daily Buyings showed the devices being purchased on March 31, 2020[14] for approximately $12,430. The total retail price of the devices was approximately $19,542.

54. On or about November 12, 2020, **Armstrong, Jawaune Antonne Lee,** and **Zxerion Lee,** transported stolen cell phones and other devices valued over $5,000 from Arkansas, in and through the Eastern District of Texas, and sold the stolen property at **Global One Wireless. Armstrong** coordinated the sale with **Abdul Bhangda.** The stolen identities used in the new line activation fraud were purchased from **Richard Sims.**

55. On or about December 9, 2020, **Armstrong and Jawaune Antonne Lee** transported stolen property valued over $5,000 from Arkansas, in and through the Eastern District of Texas, and sold the stolen property at **Global One Wireless** in Dallas, Texas.

[14] It is believed the recorded date on the Daily Buyings is off by one day.

Armstrong coordinated the sale with **Abdul Bhangda.** The stolen identities used in the new line activation fraud were purchased from **Richard Sims.**

56. On or about February 24, 2021, **Armstrong, Staten, Johnny Humphries,** and **Jawaune Antonne Lee** fraudulently obtained 18 new cell phones in Lubbock, Texas and Snyder, Texas. Law enforcement conducted surveillance on all four individuals while they made fraudulent purchases in the Lubbock area. All four individuals were taken into custody following a traffic stop. The traffic stop resulted in the recovery of 18 stolen cell phones, and multiple fraudulent identity sets that included a driver's license, social security card, and prepaid debit card. **Armstrong and Jawaune Antonne Lee** were arrested under this cause number. **Staten** and **Humphries** were indicted in the Northern District of Texas. The stolen identities used in the new line activation fraud were purchased from **Richard Sims.** The stolen new cell phones were destined for **Abdul Bhangda.**

Natasha Latrice Qualls - Compromised Employee and Device Trafficker

57. **Natasha Latrice Qualls** conducted new line activation fraud working at Walmart stores in Carrollton, Texas and Lewisville, Texas[15]. **Natasha Latrice Qualls** coordinated the sale of the new stolen cell phones with **Abdul Bhangda.** From approximately December 2019 through August 2020, the **RJ Telecom** Daily Buyings listed approximatley 223 devcies for **Natasha Latrice Qualls** totaling approximately $197,260. AT&T confirmed some of these devices as stolen.

58. On or about November 30, 2019, **Natasha Latrice Qualls** as a Premium Retail Service employee working at Walmart store 5092, 190 E. Round Grove Road, Lewisville, Texas,

[15] Walmart uses Premium Retail Services, a third party company, to staff employees used to manage the telephone carrier service and electronic devices it sells within its businesses. Qualls worked for Premium Retail Services.

a location within the Eastern District of Texas, activated four new lines resulting in four new cell phones using identity theft. The activations were found to be fraud by AT&T.

59. On or about December 1, 2019, **Shaniece Qualls** as a Premium Retail Services employee working at Walmart Supercenter store 260, 1200 N. Highway 77, Waxahachie, Texas, activated two new lines resulting in two new cellular phones using identity theft. The activations were found to be fraud by AT&T.

60. On or about December 1, 2019, **Natasha Latrice Qualls** as an employee for Premium Retail Services working at Walmart Supercenter store 5092, 190 E. Round Grove Road, Lewisville, Texas, a location within the Eastern District of Texas, fraudulently activated five new lines. The last activation took place at approximately 7:06 P.M. **Natasha Latrice Qualls** coordinated the sale of approximately 12 new stolen cell phones through messaging with **Abdul Bhangda.** Shortly after the last transaction, **Abdul Bhangda** advised he was at "IHOP". The eleven IMEIs activated by **Natasha Latrice Qualls and Shaniece Qualls** were included in **RJ Telecom, Inc.** invoices dated December 2, 2019 (number 122191121), December 3, 2019 (number 12319520) and December 4, 2019 (number 124191051)[16], for shipment to Xpress Logistics FZCO in Dubai, U.A.E., and billed to Dubai based companies Blue Orbit Mobile Phones Trading LLC and Grand Famous Phones Trading LLC. On December 4, 2019, a total of three FedEx packages--under the shipper name **Arsalan Bhangda** for the shipper company **RJ Telecom, Inc.**--were sent from a FedEx station at 1200 Capital Avenue, Plano, Texas, a location within the Eastern District of Texas, to Xpress Logistics in Dubai, U.A.E. Within days, **RJ Telecom** received wire transfers originating in the U.A.E. from Xpress Logistics in the amounts

[16] This same invoice to Grand Famous Phones Trading LLC dated December 4, 2019 included the IMEIs activated by both Marcus Harlston and Natasha Latrice Qualls and Shaniece Qualls.

of $174,676.72 (invoice number 122191121), $155,870.30 (invoice number 12319520) and $120,870 (invoice number 124191051).

Chukedrick D. Tarver a.k.a. "Blacc" - Device Trafficker – New Line Activation Fraud

61. Beginning in 2016, **Chukedrick D. Tarver a.k.a. "Blacc"** sold stolen new devices to **Abdul Bhangda** and used FedEx to ship new devices to **Abdul Bhangda**. **Tarver** traveled outside of Texas to Arkansas, Colorado, Kansas, and Oklahoma to fraudulently obtain devices. While traveling, **Abdul Bhangda,** at times under the instruction of **Arsalan Bhangda** sent moneys via a payment service to **Tarver**, in part to continue obtaining devices on the trip. **Brittany Vichelle Edwards** also fraudulently obtained cell phones and sold them to **Arsalan Bhangda** and **Abdul Bhangda.** On numerous occasions, **Edwards** messaged **Arsalan Bhangda** and **Abdul Bhangda** that she was picking up money for "blacc", or **Tarver a.k.a. "Blacc".**

62. From January 2019 to November 2020, the **RJ Telecom** Daily Buyings listed for **Tarver** approximately 68 devices totaling approximately $58,500. AT&T confirmed some of these devices as stolen.

63. From January 2019 to September 2020, the **RJ Telecom** Daily Buyings listed for **Edwards** approximately 66 devices totaling $49,830. AT&T confirmed some of these devices as stolen.

64. On or about December 7, 2017, **Tarver** sent to **Abdul Bhangda,** "1500 SO I CAN HAVE SOME JUGGING ROOM TOMORROW 600 OF ITS GONE ADDING THE OTHER TWO LONES 🙏🙏I TOLD I GOT THE MONEY JUST NOT ON ME CANT BE ON THE ROAD WITH ALL THAT CASH U KNOW". **Abdul Bhangda** wired approximately $1,500.

65. On or about July 6, 2019, **Edwards** obtained four new Apple iPhone Xs through new line activation fraud for a total loss of $4,800 (2 – $1,249.99; 3-$1,149.99). During the transaction, **Edwards** messaged **Arsalan Bhangda** and **Abdul Bhangda,** "Idk my plug at att tryna swap one of the phones for an iPad so I was tryna see what they pay. I'll know once I pull up", to which **Arsalan Bhangda** replied, "Which iPad model". A review of the **RJ Telecom** Daily Buyings found four sealed AT&T cell phones under "britney", and that two were sold at $770 and two were sold at $700 on July 7, 2019.

66. On or about October 29, 2019, **Edwards** messaged **Arsalan Bhangda and Abdul Bhangda,** "Anybody up there? I'm coming to pick up money for Blacc".

LaQuan Dontrial Cooks a.k.a. "Midas"- Device Trafficker

67. **LaQuan Dontrial Cooks** conducted SIM card swap fraud and new line activation fraud using identity theft. **LaQuan Dontrial Cooks** worked with **Nicholas Marcelle Chandler** and **Dante Thomas Deddo**. **LaQuan Dontrial Cooks** coordinated with **Abdul Bhangda** to sell the stolen new cell phones obtained through new line activation at **Global One Wireless**. Part of their scheme was to withdraw bank funds from the account of the legitimate telephone carrier's customer. They used the SIM card from the legitimate customer to receive the two-factor authentication via text to complete the withdrawal. **Deddo** was known to be the worker.

68. On or about July 30, 2020, **LaQuan Dontrial Cooks, Nicholas Marcelle Chandler,** and **Dante Thomas Deddo** fraudulently obtained new Apple iPhone 11s. **Deddo** was the runner while **Chandler** coordinated with **Deddo. LaQuan Dontrial Cooks** coordinated the sale of the new Apple iPhone 11s with **Abdul Bhangda.**

69. On or about August 5, 2020, **LaQuan Dontrial Cooks, Chandler** and **Deddo** were arrested by the Plano Police Department ("PPD") after conducting SIM card swap fraud

and withdrawing approximately $1,200 from the victim's Chase bank account. An attempted withdrawal of $8,000 was denied by Chase bank. All three were ultimately taken into custody and two firearms were found in their vehicle. This incident was indicted separately under Eastern District of Texas cause number 4:21-CR-206.

70. On or about January 16, 2021, **LaQuan Dontrial Cooks** and an unknown female obtained stolen new Apple iPhone 12s and accessories from a T-Mobile retail store through account takeover fraud. A SIM card swap was also performed during the transaction. **LaQuan Dontrial Cooks** coordinated the sale of the stolen new cell phones with **Abdul Bhangda** and sold the devices at **Global One Wireless**, Dallas, Texas.

Jordan Rashad Selexman a.k.a. "Fero" – Device Trafficker – New Line Activation Fraud

71. Jordan Rashad Selexman a.k.a. "Fero" was involved in obtaining new devices through new line activation fraud. From January 2019 through June 2020, the **RJ Telecom** Daily Buyings for **Selexman** listed approximately 383 devices totaling approximately $332,775. AT&T confirmed some of these devices as stolen.

72. On or about April 23, 2020, **Selexman** messaged **Abdul Bhangda** four IMEI numbers, to which **Abdul Bhangda** replied he was checking. The IMEIs were deemed fraudulent by AT&T. The IMEIs were found in the **RJ Telecom** Daily Buyings on the following day under "**Fero**". **Selexman** had messages with **Abdul Bhangda** which indicated **Selexman** was using a runner.

Patrick Lydell Simmons DTO

73. **RJ Telecom** purchased stolen devices from the **Patrick Lydell Simmons** DTO. The **RJ Telecom** Daily Buyings listed approximately 856 devices for **Patrick Lydell Simmons**

totaling approximately $606,960. The **Patrick Lydell Simmons** DTO is described in more detail below under the Suppliers **Jibran Khalil** and **Mohamed Tahiri a.k.a. "Simo".**

Samson Asres – New Line Activation Fraud

74. **Samson Asres** conducted new line activation fraud and sold the new consumer electronics to **Abdul Bhangda**. **Asres** has been indicted in the Northern District of Texas ("NDTX") under cause number 3:20-cr-601-M. In the NDTX case, **Asres** targeted unassuming victims with high credit scores and obtained their credit report information and personal identifying information. With the help of a co-conspirator, **Asres** equipped runners with this credit information, as well as a fraudulent Texas Driver's licenses bearing the photo of the runner with the information belonging to the victim. The runner would purchase high-end goods on credit, including cellular phones, and provide them to **Asres** in exchange for food or money, after which **Asres** would sell the phones. The **RJ Telecom** Daily Buyings listed approximately 1,822 devices for **Asres** at total of approximately $1,163,474.

NDTX DTO – New Line Activation Fraud

75. Eleven individuals were involved in new line activation fraud in the 2019 through 2020 timeframe that led to their indictments in the NDTX. The group used data mining to obtain stolen identities and subsequently created counterfeit documents for "runners" to activate new lines to obtain new devices which were sold to **Abdul Bhangda** and **Arsalan Bhangda.**

Jonathan Anthony Stevenson – Credit Card Fraud

76. On or about September 10, 2020, **Johnathan Anthony Stevenson** was indicted under Eastern District of Texas court cause number 4:20-CR-237 for violations of 18 U.S.C. § 1343 (wire fraud). From May 2019 to on or about February 12, 2020, **Stevenson** unlawfully obtained credit profiles containing the personal identifying information and credit card numbers

of approximately 403 victims. **Stevenson** used a digital scanning device application on his phones to store and scan the stolen credit card numbers. **Stevenson** used the stolen credit card numbers to conduct approximately 276 transactions to purchase merchandise and gift cards totaling $210,123 at Walmart, Sam's Club, and Lowe's stores across the United States, to include Sam's Club stores located in Plano, Texas, a location within the Eastern District of Texas. **Stevenson** used the gift cards to purchase electronic devices such as iPhones, iPads, and watches. The **RJ Telecom** Daily Buyings listed some of these stolen devices.

II. RJ TELECOM AND ITS SUPPLIERS

77. **RJ Telecom** purchased new devices from numerous Suppliers. The Suppliers obtained their supply from Device Traffickers and DTOs. Suppliers are also known to export new devices directly to foreign importers.

Farhan Nuruddin Parpia d/b/a CellFlex LLC (Supplier)

78. **Farhan Parpia** operated in Houston, Texas. He primarily met his Device Traffickers at various locations such as parking lots to purchase devices. He did not operate a physical store front but did maintain an office in the same building as **Sky Telecom. Sameer Ahmed Mohammed (Sky Telecom)** was sent by **Arsalan Bhangda** to purchase phones in the Houston market. **RJ Telecom** and **Sky Telecom** purchased devices from **Farhan Parpia d/b/a Cellflex.** Prior to establishing **Sky Telecom** in Houston, **Sameer Ahmed Mohammed** resided in the Dallas area and conducted transactions for **Farhan Parpia** in the Dallas area.

79. From January 2019 to October 15, 2020, the **RJ Telecom** Daily Buyings listed approximately 1,632 devices for **Sameer Ahmed Mohammed** totaling approximately $1,135,862. AT&T confirmed some of the devices were stolen.

80. For **Farhan Parpia**, bank records showed **CellFlex** received just over $3,000,000 in wire transfers from **RJ Telecom**. **CellFlex** also received a wire transfer from **MS Blue Trading (Malik Salameh a.k.a. "Blue")** in the amount of $40,215.68.

Farhan Parpia and Sameer Mohammed – Dallas Transactions

81. On or about March 22, 2018, **Farhan Parpia** coordinated with **Sameer Ahmed Mohammed** to purchase from an unknown customer six Apple iPhone 256gb for approximately $7,120. **Sameer Ahmed Mohammed** met the customer at a Kroger, in Lewisville, Texas, a location within the Eastern District of Texas. **Sameer Ahmed Mohammed** told **Farhan Parpia** that "He said it's all finance from store Phones" and "They're not clean", to which **Farhan Parpia** said, "Ok", "That's fine", "You got them?" and **Sameer Ahmed Mohammed** confirmed.

82. On or about April 6, 2018, **Farhan Parpia** coordinated with **Sameer Ahmed Mohammed** to meet with an unknown customer to purchase three iPhone X 256gb (open), two iPhone 8 Plus 64gb (open), and three iPhone 8 Plus 256 (open) for $4,240. After running the IMEIs, **Farhan Parpia** found all but one or two IMEIs were blocked and lowered the price to $3,890. **Sameer Ahmed Mohammed** met the unknown customer at a Kroger, 4620 TX-121, Lewisville, Texas, a location within the Eastern District of Texas. **Cellflex** sent two wire transfers to a **Gigabyte Trading (Sameer Mohammed)** bank account on or about April 9, 2018.

CellFlex – Purchases from DTOs

83. **Farhan Parpia** met with the Device Traffickers at numerous public locations to obtain devices. **Farhan Parpia** also picked up shipments from FedEx and took them to his office. **Farhan Parpia** coordinated with Organizers **Travis Moore** and **Nepomuceno**, and their runners to coordinate the purchases or deliveries.

84. On or about February 16, 2020, **Farhan Parpia** received a message from an unknown seller, "U don't care if phone blacklisted if new sealed right", to which **Farhan Parpia** responded, "Yea it don't matter".

Travis Moore DTO

85. **Travis Moore** was based in Houston, Texas, and recruited and organized workers to conduct new line activation fraud using fraudulent business accounts throughout the United States. **Travis Moore** coordinated the sale of the stolen devices with **Farhan Parpia.** The total approximate loss for **Travis Moore** is $606,333[17]. **Robert Denton Whitmire, Jr.** was a runner who also assisted with organizing and training other runners. Runners for **Travis Moore** were identified as:

86. **Matthew Daniel Smith, Jacqueline Sue Hardee, Daniel Shapir Rascoe, Rayanna Dawn Byers, Kieffer James Barchetti,** and **Kamie Taylor Jasinski** were runners who traveled to different states opening fraudulent business accounts to obtain new cell phones.

87. Between December 2016 and April of 2021, **Whitmire** was directly responsible for approximately $185,000 worth of loss absorbed by Verizon alone, on 187 devices. **Whitmire** utilized 12 different Identifications cards including his own TX ID card, and approximately 30 different business accounts to secure these 187 devices by fraud.

88. Between November 5, 2020, and March 20, 2021, **Matthew Smith** obtained at least 57 iPhones, iPads or other electronic devices with an associated value of approximately 58,460. These devices were obtained in at least four different states. **Matthew Smith** used at least 4 different identifications (including his own) to obtain all these devices by new business account fraud with at least 8 different victim company names.

[17] The loss amount for Travis Moore was a total of his runner's loss activity.

89. **Rascoe** and **Byers** traveled through Texas and four other states from around October 27, 2020 until **Rascoe** was arrested. During this trip, they conducted new business account fraud under the direction of **Travis Moore** during this trip that totaled approximately $30,000. The fraudulently obtained phones were shipped via FedEx to **Travis Moore.** On or about November 17, 2020, **Rascoe** was arrested in Millcreek, Utah for attempting to obtain four new stolen Apple iPhone 12s valued over $4,500 on fraudulent credit under the business name "Alta Paints & Coatings". Earlier that day, **Rascoe** and **Rayanna Dawn Byers** completed a similar transaction where they obtained four Apple iPhone 12s. The total loss for **Rascoe** was approximately $114,962 and for **Byers** it was $11,785.

90. **Kieffer James Barchetti** conducted fraudulent transactions on numerous occasions using business accounts in Texas and Oregon. The companies' names used in the fraud were found on the list of over 200 business customers located in **Travis Moore's** phone. **Barchetti** was a listed "owner" on 12 of these companies. On or about November 7, 2020, **Barchetti** fraudulently obtained credit under the business Market Makers and obtained ten Apple iPhone 12s valued at approximately $8,500. The total loss for **Barchetti** was approximately $30,843.

91. Between July 2019 and January of 2021, **Kamie Taylor Jasinski** was directly responsible for approximately $70,000 worth of loss absorbed by Verizon alone. Of approximately 72 devices, **Jasinski** utilized 5 different Identifications cards including her own TX ID card, and approximately 14 different business accounts to secure these 72 devices by fraud. On or about November 22, 2020, **Jasinski** fraudulently obtained two Apple 12s at a Verizon store in Daphne, Alabama, and shipped the devices to **Travis Moore.**

92. On or about January 7, 2021, **Jacqueline Sue Hardee** was arrested in Edmond, Oklahoma at a Verizon store attempting to open a new business account by fraud. **Hardee** had at least three forms of false identification bearing her photograph and different names. **Hardee** was also in possession of four Apple iPhone 12s fraudulently obtained earlier that day by another runner. The total approximate loss for **Hardee** was $134,889.

Junior Porfirio Nepomuceno-Hierro DTO

93. Junior Porfirio Nepomuceno-Hierro ("Nepomuceno") and **Cesar Reyes were** based in Houston, Texas, and obtained stolen identities, manufactured identification and debit/credit cards, and conducted account takeover new line activation fraud.

94. Between December 2020 and February 2021, runners working under the direction of **Nepomuceno** fraudulently obtained cell phones through account takeover fraud in numerous different states to include Georgia, Oklahoma, North Carolina, and South Carolina. The runners sent FedEx packages directly to **Farhan Parpia**.

95. On or about January 27, 2021, **Cesar Reyes** shipped a package containing counterfeit credit cards via FedEx that was seized by Texas Department of Public Safety ("DPS"). The total approximate loss tied to **Cesar Reyes** is $27,670.

96. On or about February 11, 2021, a search warrant conducted at a residence for **Nepomuceno** resulting in the seizure of counterfeit identification and credit cards, and numerous counterfeit card machines and associated identification manufacturing equipment and supplies. **Cesar Reyes** was in the residence at the time of the search warrant. The total approximately loss for **Nepomuceno** is $1,417,508.

97. On or about March 16, 2021, a search warrant conducted at the office of **Farhan Parpia** d/b/a **CellFlex LLC** resulted in the seizure of approximately 800 electronic devices to

include iPhones, Macbooks, tablets, watches, and speakers, and approximately $84,000 in U.S. currency. Verizon and AT&T reported that approximately 255 devices were stolen with a valued loss of approximately $250,000[18]. Included in the seizure were fraudulently obtained cell phones shipped from **Darius Whitlow** and a wire transfer to **Darius Whitlow,** who is based in Michigan and conducted new line activation fraud and shipped the stolen devices to **CellFlex LLC.**

Jibran Khalil d/b/a Am-Pak (Supplier)

98. Am-Pak previously operated a store in Richardson, Texas. From approximately January 2019 to December 2020, the **RJ Telecom** Daily Buyings listed approximatley 92 devcies for **Jibran Khalil** totaling $73,960. **Jibran Khalil** purchased from the following Device Traffickers:

Mardi Gras Bandits – Robbery Group

99. **Komla Detsikou, Brandon Parrish, Eric Rayshun Parrish, Antonio Williams, Jr.,** and **Lamarcus Jermaine Parrish** and others known and unknown, of the group termed "Mardi Gras Bandits", conducted approximately 11 armed takeover robberies at cell phone stores from November 2018 to February 28, 2019. **Komla Detsikou, Brandon Parrish, Eric Rayshun Parrish, Antonio Williams, Jr.,** and **Lamarcus Jermaine Parrish** were indicted and convicted in the Northern District of Texas under cause number 3:19-CR-160 for violations of Conspiracy to Interfere with Commerce by Robbery (18 U.S.C. 1951(a)) and substantive robbery and firearm charges. **Komla Detskiou** and **Brandon Parrish** primarily coordinated the sale of the stolen cell phones and other devices with **Jibran Khalil**. Some of those new stolen cell phones were then sold to **Arsalan Bhangda**.

[18] The remaining devices from the search warrant have yet to be determined if stolen.

100. On or about January 12, 2019, **Komla Detsikou, Eric Parrish, LaMarcus Parrish,** and **Brandon Parrish** conducted an armed robbery takeover of a AT&T retail store and stole 52 new Apple cell phones and other electronic devices totaling approximately $41,600. The stolen property was sold to **Jibran Khalil,** who in turn, sold approximately 37 stolen new cell phones and watches to **RJ Telecom** for a total cost of approximately $34,640. The AT&T retail cost of these devices was approximately $39,093.

101. On or about February 22, 2019, **Detsikou, Parrish, and others known and unknown,** conducted an armed robbery takeover of an AT&T retail store at 11722 Marsh Lane, #A3, Dallas, Texas, and stole approximately 14 new Apple cell phones totaling approximately $11,688. The stolen property was sold to **Jibran Khalil,** who in turn, sold all 14 new Apple cell phones to **RJ Telecom** for $10,650.

Patrick Lydell Simmons' DTO – Break Out Fraud

102. Between January 2016 and the present, **Patrick Lydell Simmons, Maryann E. Simmons, Preston Patrick Simmons, Cameron Patrick Simmons, Lauren Ashley Elizabeth Simmons, Dexter Lenner Caldwell, Keren Vargas-Gutierrez, Edward Vonal Simmons, Sabastian Dominique Blay, Carey Watkins, Jr., Michael Dimietri Reeves, Joshua Tapia, and others known and unknown (collectively the "Simmons Organization")** used shell companies to fraudulently obtain cell phones on credit from AT&T and Verizon. **Patrick Lydell Simmons** serves as the leader or Organizer of the Simmons Organization, directing others to obtain cell phones through break out fraud. Once members of the Simmons Organization take physical custody of the phones, **Patrick Lydell Simmons** coordinates the sale of the cell phones to Suppliers. **Patrick Lydell Simmons** has directed members of the Simmons Organization, including **Sabastian Dominique Blay**, to deliver

fraudulently obtained cell phones to Suppliers, including the delivery of phones to **Mohamed Tahiri** at his residence in the Eastern District of Texas located at 100 Ventura Court, Allen, Texas. In addition to running the Simmons Organization and directing others, **Patrick Lydell Simmons** has also set up and used the following shell companies himself to obtain cell phones from carriers: Corporate Purchasing Solutions, Communication Purchasing Solutions, Big Country Charity Properties, Patrick Simmons, Inc., and Big Country Charity Properties, Inc. **Patrick Lydell Simmons** used a credit card in his name at AT&T stores on 17 occasions making payments on five accounts totaling $14,048.32 before defrauding AT&T of $340,747.17 in cell phone devices directly associated with these accounts.

103. **Edward Vonal Simmons** is responsible for setting up shell companies for the Simmons Organization with the Texas Secretary of State, opening corresponding bank accounts at various financial institutions, and obtaining EINs from the Internal Revenue Service. **Edward Vonal Simmons** also creates a web presence for these businesses and obtains Dunn and Bradstreet ratings in an attempt to legitimize the businesses so that the Simmons Organization can use them to build lines of credit with the carriers in furtherance of the scheme to defraud. Some of these shell businesses list business addresses within the Eastern District of Texas where they receive mail and cell phones. **Edward Vonal Simmons** is the Registered Agent for 21 shell companies, including Accredix Inc., which were all used to fraudulently obtain cell phones from AT&T and Verizon. Accredix, Inc. is listed as the Registered Agent for 40 businesses used to fraudulently obtain cell phones from AT&T and Verizon. The registered office address for Accredix, Inc. is in Wylie, Texas, within the Eastern District of Texas. In addition, **Edward Vonal Simmons** is listed as the Organizer for an additional 45 companies listed as Registered Agents for shell companies that also fraudulently obtained cell phones from AT&T and Verizon.

Members of the Simmons Organization have entered stores in the Eastern District of Texas to fraudulently obtain cell phones on behalf of shell companies created by **Edward Vonal Simmons**, to include Fourway Finishers. In addition to creating the shell companies for the organization, **Edward Vonal Simmons** has used a credit card in his name at AT&T stores on 19 occasions, made payments on seven AT&T accounts totaling $969.99, and caused a loss to AT&T on those seven accounts of $152,883.28.

104. **Maryann E. Simmons**, **Patrick Lydell Simmons'** wife, set up C2G Foundation, and used this business to fraudulently obtain cell phones to be shipped in interstate or foreign commerce. She is listed as the Secretary for Corporate Purchasing Solutions and is a signer on the business' bank account. The Corporate Purchasing Solution bank account at BBVA is the main operating account for the Simmons Organization. The funds are used to make minimal payments on accounts to build credit with the carriers, and also serves as the main account for which the proceeds of the fraud are deposited and members of the Simmons Organization are paid. Between January 2018 and March 2021, **Maryann E. Simmons** has received 11 checks from the Corporate Purchasing Solutions account totaling $184,214.34.

105. **Preston Patrick Simmons**, a son of **Patrick Lydell Simmons**, is the Registered Agent for Atolivox, Inc., a shell company used by the Simmons Organization to fraudulently obtain cell phones. From November 2017 through March 2021, **Preston Patrick Simmons** has received 13 checks from the Corporate Purchasing Solutions operating account in the amount of $42,264. The memo line on the checks reveal that they are for the purchase of cell phones. In addition, **Preston Patrick Simmons** also received 14 ACH transfers from the same Corporate Purchasing Solutions account totaling $89,415 during this time period. **Preston Patrick Simmons** also received four wires from the Corporate Purchasing Solutions account totaling

$43,100. **Preston Patrick Simmons**, along with **Joshua Tapia** and **Keren Vargas-Gutierrez**, fraudulently obtained cell phones in the Aurora, Colorado, area that were transferred to **Patrick Lydell Simmons** and Suppliers, including **Mohamed Tahiri**, to be sold in interstate and foreign commerce.

106. **Cameron Patrick Simmons** entered an AT&T store, signed a credit sale/retail installment contract with AT&T for a personal account on November 8, 2018, and used a credit card in his name to make a payment of $32.48. On February 21, 2019, the personal line was moved to a business account at AT&T in the name of "Poni Talmon". Poni Talmon is a business created in 2013 which lists Novakanex, Inc. as its Registered Agent. Novakanex, Inc. was created by **Edward Vonal Simmons** in 2012. On September 30, 2019, AT&T closed the account due to fraud with a loss amount of $2,549.97. **Cameron Patrick Simmons** has two businesses: Charming Homebuilders and Cam's Landscaping. From April 2015 through December 2020, Corporate Purchasing Solutions has paid **Cameron Patrick Simmons** and his business entities a combined $678,676 in illegal proceeds from the Simmons Organization's break out fraud.

107. **Lauren Ashley Elizabeth Simmons**, the daughter of **Patrick Lydell Simmons**, has set up two shell businesses to fraudulently obtain cell phones on behalf of the Simmons Organization. On April 2, 2020, she set up a Verizon account for 1NF1NITE PRINTS, and obtained 8 iPhone 11 ProMax phones. As of October 2020, she still owed a balance of $8,264.15. On May 19, 2020, **Lauren Ashley Elizabeth Simmons** set up a Verizon account for her other business, M8NGOBERRY CO, and obtained 11 iPhone 11 ProMax phones. She has attempted to obtain an additional five phones from Verizon. Between September 2015 and

March 2021, **Lauren Ashley Elizabeth Simmons** has received $23,803 from the Corporate Purchasing Solutions operating account.

108. **Sabastian Dominique Blay** obtained cell phones from Verizon and AT&T on behalf of the Simmons Organization at the direction of **Patrick Lydell Simmons**. **Sabastian Dominique Blay** was directed to take fraudulently obtained cell phones to **Mohamed Tahiri** at **Tahiri's** residence in Allen, Texas, knowing that the phones would be resold. In addition, **Sabastian Dominique Blay** created eight business accounts with Verizon in the name of Boothwick Enterprises, and received $54,844.67 worth of cell phones shipped in the mail to his residence in Weatherford, Texas. He also created eight business accounts with AT&T in the name of Boothwick Enterprises, and received over $59,599.47 worth of cell devices in the mail.

109. **Carey Watkins, Jr.**, in furtherance of the conspiracy, used a credit card in his name at AT&T stores on 85 different occasions. He made payments on 20 separate AT&T accounts totaling $64,915.90; however, the total fraud amount connected to those accounts at AT&T amounts to $1,013,685.72. Virqualax is a shell company for which **Carey Watkins, Jr.** conducted fraudulent activity on behalf of the Simmons Organization. **Carey Watkins, Jr.** received at least $19,150 in check payments from the Corporate Purchasing Solutions operating account. One payment memo line indicated the payment was "For 52 Phones". On February 14, 2019, **Carey Watkins, Jr.** was arrested by the Irving Police Department for forgery while inside an AT&T store attempting to purchase phones on behalf of Sierrelix. Sierrelix is a shell company that was created by **Edward Vonal Simmons**.

110. **Joshua Tapia** is the organizer of two companies in Texas and two companies in Colorado that he used to fraudulently obtain cell phones on behalf of the Simmons Organization and later, himself. Between December 11, 2017 and January 24, 2019, **Joshua Tapia** went

inside Verizon stores in Colorado four times to pick up 17 phones for Makaukope, Kvonmyway, and Tapisonex, shell businesses associated with him and **Keren Vargas-Gutierrez**. Between September 15, 2017 and October 20, 2018, Verizon shipped 246 phones to addresses associated with **Joshua Tapia**. **Joshua Tapia** and **Keren Vargas-Gutierrez** had 251 phones shipped from AT&T to addresses associated with them in Colorado. Between October 2017 and June 2018, Corporate Purchasing Solutions paid Tapisonex a total of $8,209. In addition, **Joshua Tapia** or his related entities, received 12 ACH transfers and 5 wire transfers from Corporate Purchasing Solutions totaling $209,159.75.

111. **Keren Vargas-Gutierrez** is the organizer of six companies in Texas and six companies in Colorado that she used with **Joshua Tapia** to fraudulently obtain cell phones on behalf of the Simmons Organization. On September 20, 2019, **Keren Vargas-Gutierrez** picked up 15 phones from Verizon using the following shell companies: Celloplusus, Bridewithoutzilla, Kvonmyway, and Tapisonex. Between August 14, 2019 and September 20, 2019, Verizon shipped 113 phones to addresses associated with **Keren Vargas-Gutierrez** and **Joshua Tapia** and their related entities in Colorado. AT&T shipped 251 phones during this time to addresses associated with **Keren Vargas-Gutierrez** and **Joshua Tapia** and their related entities in Colorado.

112. **Michael Dimietri Reeves** acted as both a Device Trafficker and Supplier for the Simmons Organization. As a Supplier for the Simmons Organization, Corporate Purchasing Solutions paid **Michael Dimietri Reeves** $25,000 by wire on December 12, 2019. As a Device Trafficker, **Michael Dimietri Reeves**, using shell companies controlled by the Simmons Organization to include Virqualax, Fourway Finishers, and Logistics N Motion, fraudulently obtained cell phones. On 20 different occasions, **Michael Dimietri Reeves** used a credit card in

his name at AT&T stores. He made payments totaling $31,794.15 on seven separate AT&T accounts, however, the total loss associated with those accounts totals $391,215.67. For his work as a Device Trafficker, **Michael Dimietri Reeves** has received at least $12,327 in check payments from Corporate Purchasing Solutions.

113. **Dexter Lenner Caldwell** was employed by AT&T as a "Revenue Management Representative" from March 23, 2009 through March 14, 2018. **Dexter Lenner Caldwell** has obtained cell phones on behalf of the Simmons Organization using shell companies controlled by the organization, including Virqualax. He has used a credit card in his name at AT&T stores on 31 occasions. **Dexter Lenner Caldwell** has made payments on seven separate AT&T accounts totaling $11,248.61; however, the total fraud associated with those seven accounts is $258,747.47. Corporate Purchasing Solutions has paid **Dexter Lenner Caldwell** $10,267.

114. From January 2016 through March 2021, **Patrick Lydell Simmons** used two business bank accounts, one in the name of Corporate Purchasing Solutions and the other in the name of Patrick Simmons, Inc., to receive payment for the sale of fraudulently obtained cell phones to Suppliers including **RJ Telecom, Jibran Khalil, Mohamed Tahiri,** and their related entities, who shipped the phones in interstate and foreign commerce. Of the more than $3 million received from Suppliers from January 2016 through March 2021, **RJ Telecom, Jibran Khalil, Mohamed Tahiri**, and their related entities paid **Patrick Lydell Simmons'** businesses over $1.5 million.

United States Secret Service – Controlled Sales - 2019

115. In 2019, the USSS conducted numerous controlled sales with **Jibran Khalil.** The USSS told **Jibran Khalil** the devices were stolen. He purchased them in exchange for U.S. currency.

Jibran Khalil and RJ Telecom

116. On or about January 22, 2019, **Arsalan Bhangda a.k.a. "Adam"** sent **Abdul Bhangda** an e-mail with a subject line "JIBRAN INVOICE" and an Excel spreadsheet attachment. The spreadsheet listed 60 Apple cell phones and two Apple watches. Each device had an associated IMEI number and prices were listed except for one IMEI for a total of $53,240. Of the 62 IMEIs: 1) 38 IMEIs were tied to fraudulent Verizon purchases by **Keren Vargas-Gutierrez, Joshua Tapia, Preston Lydell Simmons, Nyana Simmons, and Dexter Lenner Caldwell.** Within the 38 IMEIs, five new Apple iPhone XSs were fraudulently obtained by **Dexter Lenner Caldwell** under the business name Timepinch Planners. The credit process and orders were conducted at a Verizon outlet store, 741 N. Central Expressway, Plano, Texas, a location within the Eastern District of Texas, on December 20, 2018 and on January 5, 2019; 2) 10 IMEIs were unknown; 2) 10 IMEIs were tied to fraud through AT&T and Sprint; 3) three IMEIs were tied to theft; 4) and one IMEI was a new Apple iPhone 64GB (sealed) that was sold to **Jibran Khalil** during a controlled sale conducted by the United States Secret Service ("USSS") in January 2019.

Mohamed Tahiri d/b/a Kenzo Group, Inc (Supplier)

117. **RJ Telecom** purchased devices from **Mohamed Tahiri.** The **RJ Telecom** Daily Buyings listed approximately 817 devices for **Tahiri** totaling approximately $494,535[19]. AT&T confirmed some of the devices were stolen.

118. From January 2016 through March 2021, **Mohamed Tahiri** has paid Corporate Purchasing Solutions, a company controlled by **Patrick Lydell Simmons**, more than $800,000 for cell phones obtained by the Simmons Organization. During that same period, **Tahiri's**

[19] Associated prices were not listed for numerous devices.

companies, **JAD Electronics** and **Kenzo Group** have sent multiple international shipments to the UAE and/or China using a shipping code to identify the shipments' content as telephone sets, to include telephones for cellular networks or for other wireless networks. From January 2018 through January 2021, **Tahiri** has received payment from **RJ Telecom** and its related entities on 50 occasions totaling more than $1,400,000. Of the 19 wires sent from **RJ Telecom** and its related entities to **Tahiri** in 2020 and 2021, 15 wires indicated the purpose of the wire was for the "Purchase of Phones".

119. **Mohamed Tahiri** has purchased fraudulently obtained cell phones from **Joshua Tapia** through wire transfers. Specifically, on December 29, 2020, **Tahiri** sent a wire using his **Kenzo Group** bank account at East West Bank originating from the Eastern District of Texas to **Joshua Tapia** in the amount of $15,275. Again, on January 26, 2021, **Tahiri** sent a wire using his **Kenzo Group** bank account at East West Bank originating from the Eastern District of Texas to **Joshua Tapia** in the amount of $9,500.

120. Throughout the conspiracy, members of the Simmons Organization have delivered fraudulently obtained cell phones to **Mohamed Tahiri** at his house located in Allen, Texas, within the Eastern District of Texas. On June 28, 2021, **Mohamed Tahiri** purchased five iPhones at his residence in Allen, Texas, for $2,000.

Michael Joseph Savattere d/b/a Cellphonexchange LLC (Supplier)

121. **Cellphonexchange** operates a store front in Garland, Texas. **Savattere** has supplied devices to **RJ Telecom** since at least 2016. **Savattere** has employees who work for him and at times had employees deliver phones to **RJ Telecom**. From approximately January 2019 to August 2020, the **RJ Telecom** Daily Buyings listed approximately 1,168 devices for **Savattere** totaling approximately $758,230. AT&T confirmed some devices were stolen.

122. **Aashish Bhusal** was a Device Trafficker involved in new business account break out fraud that sold phones to **Savattere.** AT&T provided an approximate fraud loss for **Bhusal** of $541,645.

123. On or about May 20, 2019, **Bhusal** obtained ten new Apple iPhones through new business account fraud at an AT&T store at 12021 Dallas Parkway, Frisco, Texas, a location within the Eastern District of Texas, through his company Servemypc LLC. The Daily Buyings found two of the ten devices listed as sold from **Savattere.** Days later, **Savattere** messaged **Abdul Bhangda** a list of 24 devices with model numbers and other characteristics for a total of $16,810. The Daily Buyings found 24 devices for a total of $16,800 from **Savattere,** including the 10 devices obtained by **Bhusal** on March 20, 2019.

124. In May 2021, the FBI conducted a controlled sale with **Savattere** and an employee ("Employee 1") at Cellphone Xchange, 3345 Broadway Boulevard, Garland, Texas. They purchased one Apple Macbook and two Apple iPhones. The devices were new and sealed. The FBI represented the devices were stolen from a warehouse.

125. In August 2021, the FBI conducted a second controlled sale of Apple Macbooks and Apple cell phones at the business with an unknown employee. The sale was coordinated with Employee 1. The devices were new and sealed.

Malik Salameh and Mohammad Salameh d/b/a MS Blue Trading (Supplier)

126. MS Blue Trading operates the store I Blue Trading in Dallas, Texas. **Malik Salameh** is the owner and **Mohammad Salameh** works for him. From approximately January 2019 to December 2020, the **RJ Telecom** Daily Buyings listed approximatley 5,354 devices for

Malik Salameh a.k.a. "Blue" totaling $3,384,592[20]. From approximately January 1, 2019 to December 2020, the **RJ Telecom** Daily Buyings listed approximatley 221 devcies for **Mohammad Salameh a.k.a. "Moe",** totaling approximately $167,821. For both **Malik Salameh** and **Mohammad Salameh,** AT&T confirmed some of the devices were stolen.

127. **Taurean Armstrong** sold new cell phones purchased through new line activation fraud to **Malik Salameh** and **Ryeshawn Green a.k.a. "Peso"** discussed with **Abdul Bhangda** taking all of his product to "blue", believed to be **Malik Salameh.**

128. In May 2021, the FBI conducted a controlled sale with **Mohammad W. Salameh a.k.a. "Moe",** at the store I Blue Trading, 326 West Jefferson Boulevard, Dallas, Texas. The FBI sold three Apple iPhone 11 Pro 256GB for $440 each and seven Apple iPhone 11 Pro 64GB for $350 each. All ten Apple iPhones were new and sealed. The FBI represented that the devices were stolen from a warehouse.

129. In May 2021, the FBI conducted a controlled sale with **Mohammad W. Salameh a.k.a. "Moe",** at the store I Blue Trading, 326 West Jefferson Boulevard, Dallas, Texas. The FBI sold one Apple Macbook and two Apple iPhone 12s 64GB for a total of $1,670. The devices were sealed and new.

130. In July 2021, the FBI conducted a controlled sale with **Malik Salameh a.k.a. "Blue",** at the store I Blue Trading, 326 West Jefferson Boulevard, Dallas, Texas. The FBI sold two Apple Macbooks, one Apple 12 Pro Max, and two iPhone 12s for $3,200. The devices were new and sealed. The FBI represented the devices were stolen from a warehouse. During the sale, **Malik Salameh** self-identified as "Blue".

[20] Numerous devices did not have an associated sale price. There were also approximately 34 devices from May 2018.

SCS Supply Chain and Giz Mobile – Feras Mahmod Obeidat (Supplier)

131. **SCS Supply Chain** is an office with a loading dock located in Farmers Branch, Texas. The business appears to primarily be a collection office for devices. The business **Gizmobile** operates numerous physical stores under **Giz Mobile** in the Dallas area. These stores are open to the public. **SCS Supply Chain** and **RJ Telecom** have supplied each other with devices. **SCS Supply Chain** also appears to sell devices to the **RJ Telecom** affiliated company **Interstellar** in Dubai.

132. **Bank records and other information found SCS Supply Chain** dealt with other Suppliers to include: **MS Blue Trading (Malik Salameh), Jibran Khalil, and Dawn Wireless.** They also purchase devices from **Dawn Wireless.**

Giz Mobile – Controlled Sales and Dawn Wireless

133. In May 2021, the FBI conducted a controlled sale with **Feras Mahmod Obeidat,** at **Giz Mobile**, 5441 Alpha Road, Suite 110, Dallas, Texas. The FBI sold ten Appple iPhone SE 128GB for $300 each. All ten Apple iPhones were new and sealed. The FBI represented the devices were stolen from a warehouse. After the purchase, surveillance followed **Obeidat** to **SCS Supply Chain** in Farmers Branch.

134. In May 2021, the FBI conducted a controlled sale with **Feras Mahmod Obeidat,** at **Giz Mobile**, 5441 Alpha Road, Suite 110, Dallas, Texas. The FBI sold one Apple Macbook for $1,100 and two new sealed Apple iPhone 12s 64GB for $660 each. The devices were new and sealed. The FBI represented the devices were stolen from a warehouse.

135. In August 2021, the FBI coordinated a controlled sale with **Feras Mahmod Obeidat** that took place with an employee at **Giz Mobile**, 5441 Alpha Road, Suite 110, Dallas,

Texas. The FBI sold seven iPhone XRs, four iPhone 12, and four Apple Macbook Pros totaling $8,850.

Ali Anwar and Abdullah Anwar d/b/a Dawn Trading LLC (Supplier)

136. **Dawn Trading LLC** operates two physical stores in Dallas, Texas and Mesquite, Texas. **Ali Anwar** and **Abdullah Anwar** supplied devices to **RJ Telecom.** From approximately January 2019 to December 2020, the **RJ Telecom** Daily Buyings listed approximatley 1,341 devcies for **Ali Anwar** totaling $856,670 and approximatley 3,521 devices for **Abdullah Anwar** totaling $1,847,156[21]. AT&T confirmed some of these devices were stolen.

137. The Device Traffickers or Suppliers who sold to **Dawn Trading LLC** are as follows:

Strong Arm Robbery and Thefts – Dallas, Texas

138. **Howard Theodore Thompson** and **Jordan Jaquan Wright** were involved in at least 11 thefts or strong-arm robberies at numerous carrier retail stores in the Dallas area from June 2021 until July 21, 201, when they were arrested after the offense. In the series of offenses, **Howard Thompson and Jordan Wright** stole over $100,000 in devices. On July 21, 2021, **Howard Thompson and Jordan Wright** stole approximately $9,000 worth of devices. After the offense and prior to their arrest, they coordinated the sale of the stolen devices with **Ali Anwar.** The transaction is believed to have taken place at a gas station across the street from the **Dawn Wireless** store location in Mesquite, Texas. Soon after the transaction, both **Howard Thompson and Jordan Wright** were taken into custody by the Dallas Police Department. In **Howard Thompson's** seized phone, a cell number used by **Ali Anwar** was listed with a "plug" emoji,

[21] Numerous devices for both **Ali Anwar and Abdullah Anwar** did not have an associated sales price.

and in **Jordan Wright's** seized phone, the cell number used by **Ali Anwar** was listed as "Plug2".

Dawn Wireless Controlled Purchase and SCS Supply

139. In April 2021, the FBI conducted a controlled sale with **Ali Anwar.** The FBI sold one Apple 16-inch Macbook for $1,700 and five 13-inch Macbooks for $900 totaling $6,200. All six Macbooks were new and sealed. The FBI represented the devices were stolen from a warehouse. Following the sale, **Ali Anwar** went his **Dawn Wireless** store in Mesquite, Texas. After a brief time in the store, **Ali Anwar** went to the **SCS Supply Chain** office in Farmers Branch, Texas. **Ali Anwar** took five similar Apple Macbook boxes inside of the store and returned empty handed.

Avaz Karimov d/b/a UZ Global and Pyramid Moving (Supplier)

140. **Avaz Karimov d/b/a UZ Global and Pyramid Moving** sold devices to **RJ Telecom.** Bank records showed **RJ Telecom** paid approximately $164,222 to both **UZ Global and Pyramid Moving.** Bank records also showed **Kenzo Group (Mohamed Tahiri)** paid approximately $47,500 to **UZ Global** and **Dawn Trading** paid **Pyramid Moving** approximately $ 20,350. A Device Trafficker who sold to **Karimov** was **Clifford Jerome Smith.**

141. **Clifford Jerome Smith** was employed at a Samsung E-Commerce Warehouse until he was terminated for stealing devices from the warehouse. While employed, **Clifford Jerome Smith** stole at least $325,000 in new Samsung S20s by shipping them from the warehouse over the course of approximately eleven months ending in January 2021. The new devices were sold to **Karimov** in Plano, Texas, a location within the Eastern District of Texas. Of the approximate 97 shipped packages by **Clifford Smith,** there are approximately 71 unverified shipped packages with no associated loss value. Samsung obtained purchase

information for approximately 18 of these stolen devices, of which 13 were purchased from: 1) nine consumers purchased S20s via Amazon from two Canadian companies. The Canadian companies purchased the devices from **SCS Supply Chain,** who shipped the devices directly to an Amazon Fulfillment warehouse in Oklahoma; 2) two S20s were purchased from **Gizmobile** (one purchase from the store on Alpha Road), and one S20 was purchased from **Dawn Trading LLC** at one of their stores in Dallas, Texas.

Shahrukh Razzak d/b/a SR Cell (Supplier)

142. **Shahrukh Razzak** resides in Plugerville, Texas and supplied devices to **RJ Telecom.** From approximately January 2019 to November 2020, the **RJ Telecom** Daily Buyings listed approximately 2,458 devices for **Razzak** totaling $1,999,314. AT&T and Verizon confirmed some devices were stolen.

143. In July 2019, **SR Cell** sent an invoice to **Arsalan Bhangda**. The invoice listed 18 new devices fraudulently purchased within days of the invoice. The prices listed on the **SR Cell** invoice were approximately $439 to $559 less than the retail cost of the new cell phones.

144. The **RJ Telecom** Daily Buyings show that **SR Cell** bought numerous stolen new cell phones that originated from **Joseph Cooper** and compromised employee **Arturo Gonzalez.**

145. From in or around May 2020 through July 2020, approximately 127 fraudulent A&T new line activations for an approximate loss of $123,298 were completed at Sam's Club stores in Austin, Texas and Round Rock, Texas. **Joseph Cooper** recruited runners who, along with himself, completed the transactions with a Sam's Clubs account in his name and another account tied to him. **Arturo Gonzalez** worked at these Sam's Club stores and fraudulently activated the lines for **Joseph Cooper** and his runners.

Eulises Tavarez d/b/a Best Cell Phones LLC (Supplier)

146. Since at least May 2019, **Eulises Tavarez** supplied **RJ Telecom** with stolen devices through **Best Cell Phones. NCR Wholesale** is affiliated with **Best Cell Phones**. **Nansellys Crespo-Rios works for NCR Wholesale** and used **NCR Wholesale** to supply **RJ Telecom** with stolen devices. **Both Tavarez and Crespo-Rios** reside in Killeen, Texas. From approximately April 2019 to October 2020, the **RJ Telecom** Daily Buyings listed approximately 850 devices purchased from **Tavarez** and **Crespo-Rios** totaling $529,119[22]. AT&T and Verizon confirmed some of these devices were stolen.

147. **Ruben Santana-Polanco** is a Device Trafficker who sold stolen devices to **Tavarez** and **Crespo-Rios**. **Santana-Polanco** conducted new line activation fraud in numerous states, to include locations within the Eastern District of Texas, and sold devices to **Tavarez**.

148. On or about May 17, 2020, a **Best Cell Phones** invoice listing **NCR Wholesale LLC** was sent to **RJ Telecom** in the amount of $30,600. The invoice listed IMEIs for cell phones. Verizon confirmed that the Verizon devices listed in the invoice were stolen through fraud. Two of the Verizon cell phones were fraudulently purchased by **Santana-Polanco** on May 13, 2020 in Louisiana. Information from **RJ Telecom** records obtained from the search warrant at **Global One Wireless** reflect that both devices were sent to Rahim (believed to be Ziyantec in Dubai, U.A.E.) and appear to have been registered in the U.A.E.

149. *On or about March 20, 2021,* **Santana-Polanco** *fraudulently purchased four* devices at Verizon stores in Frisco, Texas, and Propser Texas, both locations within the Eastern District of Texas.

[22] Numerous devices did not have an associated price.

150. On or about June 28, 2021, law enforcement conducted surveillance at a Verizon store in Florida. Law enforcement saw **Santana-Polanco** leave the Verizon store with a Verizon bag. They traffic stopped him. He provided his true identification to law enforcement. Law enforcement observed the Verizon bag in the backseat of the vehicle. Verizon confirmed the two devices obtained by **Santana-Polanco** were stolen by fraud. **Santana-Polanco** had produced a fraudulent identification card to Verizon.

Jordan Minh Nguyen a.k.a. "Toan" d/b/a J N Wireless (Supplier)

151. **J N Wireless** has at least one store location in the Garland, Texas area and has supplied devices to **RJ Telecom** since at least 2017. From approximately May 2018 to December 2020, the **RJ Telecom** Daily Buyings listed approximatley 3,163 devices for **Nguyen** totaling approximately $2,315,004.

Romanian DTO – New Line Activation Fraud

152. **Jordan Minh Nguyen a.k.a. "Toan"** purchased stolen devices from a DTO that consisted of Romanian nationals. They used their passports or identification cards as a means to obtain the stolen devices. The **RJ Telecom** Daily Buyings and other records found approximately 95 devices that originated with this Romanian DTO that were listed under **Nguyen**.

153. From in or around June 2019 to around August 2020, this Romanian DTO stole approximately 900 devices throughout the United States, to include locations within the Eastern District of Texas, totaling approximately $612,307. The Romanian group consisted of **Ionut Antonie, Elena Irina Antonie, Ionel Stanescu, Ana Marie Stanescu, David Constanin, Costel Stanescu, and Marian Alexandru Firu, and others known and unknown.** The group used their Romanian passports, identification cards, or driver's licenses,

and a system glitch, to fraudulently activate accounts to obtain new devices. Members of the group received numerous wire transfers from **Nguyen.**

154. On or about March 7, 2020, **Ionut Antonie,** fraudulently obtained an Apple iPhone 11 and an Apple watch under the fictitious name Iontu Prostu, at an AT&T, at 1712 E. Grand Avenue, Marshall, Texas, a location within the Eastern District of Texas. The IMEI for the Apple watch was found in the **RJ Telecom** Daily Buyings under **Nguyen.**

155. On or about March 10, 2020, **Marian Alexandru Firu**, fraudulently obtained an Apple iPad under the fictitious name Marian Alexandru Aaadsf, at an AT&T store in Wichita, Kansas. The total retail cost of the device was $779.99, approximately $200 was paid down, resulting in an approximate loss of $579. Days later, the **RJ Telecom** Daily Buyings reflected the Apple iPad IMEI obtained by **Marian Alexandru Firu** had been sold by **Nguyen** to **RJ Telecom.** The IMEI was identified in **RJ Telecom** records as being shipped to "Rahim 04/22/2020". Rahim is believed to do business as Ziyantech, a Dubai based company. On or about April 22, 2020, multiple FedEx shipments were sent under the **RJ Telecom** label from a FedEx station in Plano, Texas to Xpress Logistics, Dubai, U.A.E. **RJ Telecom** received an incoming wire transfer from Ziyantec Electronics Trading, L.L.C. from Dubai, U.A.E in May 2020.

J N Wireless Controlled Sale and RJ Telecom

1. In August 2021, the FBI conducted a controlled sale with **Nguyen** at his business J N Wireless, at 4750 N. Jupiter Road, Garland, Texas. The FBI sold two Apple Macbook Pros and two Apple iPhone 12 Pros totaling $3,360. The devices were new and sealed. The FBI represented that the devices were stolen from a warehouse. After the controlled sale, **Nguyen** placed white boxes consistent with the Apple Macbook Pros just sold to him by the FBI in his

vehicle. **Nguyen** then drove to the **RJ Telecom** office parking lot at 12770 Coit Road, Dallas, Texas. An unknown male appeared from the loading dock area and retrieved multiple white boxes, similar to Apple product boxes, from the back seat of **Nguyen's** car. The unknown male then met with a driver of a white Toyota sedan before returning to the loading dock area. The Toyota sedan went to **Global One Wireless** for a short time period before returning to the **RJ Telecom** office parking lot near the loading docks. There, **Abdul Bhangda** in his vehicle, and two other vehicles, went to the loading dock area. All three vehicles were loaded with packages that appeared to come from the loading dock area. The same unknown male that retrieved the boxes from **Nguyen's** rear seat was with **Abdul Bhangda** and the other individuals. The three vehicles departed the loading dock area. Law enforcement was unable to maintain surveillance, but soon after found **Abdul Bhangda's** vehicle and the white Volkswagon Jetta at a FedEx station located at 1200 Capital Avenue, Plano, Texas. **Abdul Bhangda** delivered two large boxes with a dolly to the FedEx station. FedEx records showed that 10 packages were sent under **RJ Telecom's** shipping account and were destined for Xpress Logistics in Dubai, U.A.E.

All in violation of Title 18 U.S.C. §§ 371 and 2314, and 2.

Count Five

Violation: Violation of 18 U.S.C. §1349
(Conspiracy to Commit Mail Fraud in Violation of 18 U.S.C. §1341)

From in or about January 2016 and continuing up to and including the date of this indictment, the exact dates being unknown to the Grand Jury, in the Eastern District of Texas and elsewhere, the Defendants specifically named in Count Four, and others known and unknown to the Grand Jury, excluding Jibran Khalil, did conspire, confederate and agree with each other, with intent to defraud, devised, or willfully participated in, with knowledge of its fraudulent nature, the above-described

scheme and artifice to defraud and obtain property by materially false or fraudulent pretenses, representations, and promises, and for the purpose of executing the scheme or artifice, did knowingly cause to be delivered by a private and commercial interstate carrier according to the direction thereon, the following matter: new devices (e.g., phones, tablets, laptops, and smart watches).

MANNER AND MEANS

1. The allegations contained in Count Four of this Superseding Indictment are incorporated by reference as though set forth in full herein.

2. Throughout the conspiracy, **RJ Telecom** shipped packages containing stolen devices via FedEx to import companies like Xpress Logistics in the U.A.E. and Hanggroup Telecom in Hong Kong. In many instances, **RJ Telecom** shipped these packages from a FedEx station located at 1200 Capital Avenue, Plano, Texas, a location within the Eastern District of Texas.

3. Device Traffickers traveled outside of Texas to obtain fraudulent devices or coordinate the purchases from a different state. In many instances, the defendants shipped the stolen devices using interstate carriers.

OVERT ACTS

4. On or about February 9, 2018, **Cary Thompson** shipped a package via FedEx from 1500 Westpark Drive, Little Rock, Arkansas to a FedEx station located at 1200 Capital Avenue, Plano, Texas, a location within the Eastern District of Texas.

5. On or about December 4, 2019, a total of approximately three FedEx packages--under the shipper name **Arsalan Bhangda** for the shipper company **RJ Telecom**—believed to

contain stolen phones from **Cary Thompson,** were sent from a FedEx station at 1200 Capital Avenue, Plano, Texas, within the Eastern District of Texas, to Xpress Logistics in Dubai, U.A.E.

6. On October 7, 2019, AT&T mailed four fraudulently obtained cell phones in interstate commerce to Big Bronze Inc., a shell company used by the **Simmons Organization,** from the AT&T Distribution Center located in Pennsylvania to 825 Market Street, Allen, Texas, within the Eastern District of Texas, via FedEx.

All violation of Title 18, U.S.C. §1341 and §1349.

Count Six

Violation: 18 U.S.C. §1349
(Conspiracy to Commit Wire Fraud in violation of 18 U.S.C. §1343)

From in or about January 2016 and continuing up to and including the date of this indictment, the exact dates being unknown to the Grand Jury, in the Eastern District of Texas and elsewhere, the Defendants specifically named in Count Four, and others known and unknown to the Grand Jury, excluding Jibran Khalil, did conspire, confederate and agree with each other, with intent to defraud, devised, or willfully participated in, with knowledge of its fraudulent nature, the above-described scheme and artifice to defraud and obtain property to wit: new devices (e.g., phones, tablets, laptops, and smart watches) by materially false or fraudulent pretenses, representations, and promises, and for the purpose of executing the scheme or artifice, did knowingly transmit or cause the transmission of any writing, signal, or sound by means of wire communication in interstate commerce.

MANNER AND MEANS

1. The allegations contained in Count Four of this Superseding Indictment are incorporated by reference as though set forth in full herein.

OVERT ACTS

2. In February 2018, Corporate Purchasing Solutions received 3 checks from "**Kenzo Group**" totaling $65,750. **Kenzo Group** is owned by **Mohamed Tahiri**.

Date	Check Payer Name	Check Owner Name	Amount	Receiver Account	Receiver Account Owner
2/6/2018	Kenzo Group	Mohamed Tahiri	25,000.00	Corporate Purchasing Solutions	Patrick Lydell Simmons
2/9/2018	Kenzo Group	Mohamed Tahiri	24,436.00	Corporate Purchasing Solutions	Patrick Lydell Simmons
2/22/2018	Kenzo Group	Mohamed Tahiri	16,314.00	Corporate Purchasing Solutions	Patrick Lydell Simmons
			$65,750.00		

3. On March 1, 2018, **Kenzo Group** account 1881919136 held at Comerica Bank received a wire in the amount of $73,463 from **RJ Telecom's** JPM Chase account 836070917. **RJ Telecom** is owned by **Arsalan Bhangda.** The memo line lists "PURCHASE OF MOBILE PHONES INVO ICE 3/1/2018".

Date	Receiver Name	Receiver Owner Name	Receiver Account #	Amount	Sender	Sender Owner	Sender Account #	Memo
3/1/2018	Kenzo Group	Mohamed Tahiri	Comerica - 1881919136	73,463.00	RJ Telecom	Arsalan Bhangda	JPM Chase - 836070917	PURCHASE OF MOBILE PHONES INVO ICE 3/1/2018

4. **RJ Telecom** account 003273 held at Texas Republic Bank and owned by **Arsalan Bhangda** conducted two wire transactions to the Corporate Purchasing Solutions account 6723768495 held at BBVA Compass totaling $81,140. Account 6723768495 is owned by **Patrick Lydell Simmons.** The memo notes for each wire transaction list "Purchase of Phones Invoice XXXXX"

Sender Name	Owner Name	Date	Amount	Category	Receiver Account Number	Receiver Name	Memo Line Notes
RJ TELECOM, INC.	Arsalan Bhangda	5/17/2019	40,130.00	Wire Transfer	6723768495	Corporate Purchasing Solutions	PURCHASE OF PHONES INVOICE 51719
RJ TELECOM, INC.	Arsalan Bhangda	6/4/2019	41,010.00	Wire Transfer	6723768495	Corporate Purchasing Solutions	PURCHASE OF PHONES INVOICE 6419

5. **Mohamed Tahiri** using his **Kenzo Group** account at East West Bank, initiated wires from his residence in the Eastern District of Texas as well as a bank branch located in the Eastern District of Texas, to pay Device Traffickers such as **Joshua Tapia**.

All violation of Title 18, U.S.C. §§1343 and 1349.

Count Seven

Violation: 18 U.S.C. § 1956(h) (Conspiracy to Commit Money Laundering)

1. The allegations contained in Count Four of this Superseding Indictment are incorporated by reference as though set forth in full herein.

2. From in or about January 1, 2016, and continuing up to and including the date of this indictment, the exact dates being unknown to the Grand Jury, in the Eastern District of Texas, and elsewhere, **Arsalan Bhangda, a.k.a. "Adam", Abdul Basit Bhangda, Farhan Parpia, Sameer Ahmed Mohammed, Jibran Khalil, Mohamed Tahiri a.k.a. "Simo", Patrick Lydell Simmons, Michael Joseph Savattere, Malik Salameh, a.k.a. "Blue", Ali Anwar, Abdullah Anwar, Avaz Karimov, Shahrukh Razzak, Eulises Isidro Tavarez,** and others known and unknown, did knowingly combine, conspire, andagree with other persons,

known and unknown to the Grand Jury, to commit offenses against the United States in violation of 18 U.S.C. §§ 1956 and 1957, that is:

a. to knowingly conduct and attempt to conduct financial transactions affecting interstate commerce and foreign commerce, which transactions involved the proceeds of specified unlawful activity, that is wire fraud, a violation of 18 U.S.C. § 1343, mail fraud, a violation of 18 U.S.C. § 1341, and 18. U.S.C. § 2314, interstate transportation of stolen property, with the intent to promote the carrying on of specified unlawful activity, in violation of 18 U.S.C. § 1956(a)(1)(A)(i); and

b. to knowingly conduct and attempt to conduct financial transactions affecting interstate commerce and foreign commerce, which transactions involved the proceeds of specified unlawful activity, that is wire fraud, a violation of 18 U.S.C. § 1343, mail fraud, a violation of 18 U.S.C. § 1341, and 18. U.S.C. § 2314, interstate transportation of stolen property, knowing that the transactions were designed in whole and in part to conceal and disguise the nature, location, source, ownership, and control of the proceeds of specified unlawful activity, and that while conducting and attempting to conduct such financial transactions, knew that the property involved in the financial transactions represented the proceeds of some form of unlawful activity, in violation of 18 U.S.C. § 1956(a)(1)(B)(i);

c. to knowingly conduct and attempt to conduct financial transactions affecting interstate commerce and foreign commerce, which

transactions involved the proceeds of specified unlawful activity, that is, wire fraud, a violation of 18 U.S.C. § 1343, mail fraud, a violation of 18 U.S.C. § 1341, and 18. U.S.C. § 2314, interstate transportation of stolen property, knowing that the transaction was designed in whole and in part to avoid a transaction reporting requirement under state and federal law, and that while conducting and attempting to conduct such financial transaction knew that the property involved in the financial transaction, represented the proceeds of some form of unlawful activity, in violation of 18 U.S.C.§ 1956(a)(1)(B)(ii);did knowingly transport, transmit, or transfer, or attempt to transport, transmit, or transfer a monetary instrument or funds from a place in the United States to or through a place outside the United States, or to a place in the United States from or through a place outside the United States, with intent to promote the carrying on of specified unlawful activity, that is, wire fraud, a violation of 18 U.S.C. § 1343, mail fraud, a violation of 18 U.S.C. § 1341, and 18. U.S.C. § 2314, interstate transportation of stolen property, in violation of 18 U.S.C. § 1956(a)(2)(A); and

d. to knowingly transport and transmit and transfer and attempt to transport and transmit and transfer funds from a place in the United States to and through a place outside the United States knowing that the funds involved in the transportation represent the proceeds of some form of unlawful activity and knowing that such transportationwas

designed in whole and in part to conceal and disguise the nature, location, source, ownership, and control of the proceeds of specified unlawful activity, that is, wire fraud, a violation of 18 U.S.C. § 1343, mail fraud, a violation of 18 U.S.C. § 1341, and 18. U.S.C. § 2314, interstate transportation of stolen property, in violation of 18 U.S.C. § 1956(a)(2)(B)(i); and

e. to knowingly engage and attempt to engage, in monetary transactions by, through, and to a financial institution, affecting interstate and foreign commerce, in criminally derived property of a value greater than $10,000, and such property having been derived from a specified unlawful activity, that is, wire fraud, a violation of 18 U.S.C. § 1343, mail fraud, a violation of 18 U.S.C. § 1341, and 18. U.S.C. § 2314, interstate transportation of stolen property, inviolation of 18 U.S.C. § 1957.

All in violation of 18 U.S.C. § 1956(h).

NOTICE OF INTENTION TO SEEK CRIMINAL FORFEITURE

As a result of committing the offenses charged in this Third Superseding Indictment, the defendants shall forfeit to the United States, pursuant to 18 U.S.C. §§ 981(a)(1)(c), 982, and 924(d); and 28 U.S.C. § 2461, all property used to commit or facilitate the offenses, proceeds from the offenses, real or personal property involved in violations of 18 U.S.C. §§ 1956 or 1957, or traceable to such property, and property derived from proceeds obtained directly or indirectly from the offenses, including but not limited to the following:

1. One semi-automatic handgun, manufacturer Glock, serial number UKD-679;
2. One semi-automatic handgun, manufacturer Glock, serial number MXX-000;
3. $7,937 in United States Currency seized from Alcides Scott;
4. $1,205 in United States Currency seized from A.A.;
5. $6,568 in United States Currency seized from D.H.;
6. $5,259 in United States Currency seized from Jerome Omega Boulden, Jr.;
7. $2,900 in United States Currency seized from Devonte Keshan Roberson;
8. One semi-automatic handgun, manufacturer Smith & Wesson, Serial number DSE3330;
9. The real property located at 609 Golden Bell Lane, Plano, Texas 75074, Collin County. More specifically described as: Lot 32, Block E of Parkway Heights, Phase 2, an Addition to the City of Plano, Collin County, Texas, as shown according to the Plat thereof recorded in Volume 2015, Page 297, Plat recorded in Collin County, Texas.
10. The real property located at 5017 Albatross Drive, Plano, Texas 75074, Collin County. More specifically described as: Lot 9, Block H of Parkway Heights, Phase 2, an Addition to the City of Plano, Collin County, Texas, as shown according to the Plat thereof in Volume 2015, Page 297, Plat Recorded in Collin County, Texas.
11. The real property located at 4415 San Jacinto Street, Dallas, Texas 75204, Dallas County. More specifically described as: Being a part of Block 16/647, PEAKS SUBURBAN ADDITION, an Addition to the City of Dallas, Texas, according to the Map thereof recorded in Volume 45, Page 56, Deed Records of Dallas County, Texas.
12. Real Property located at 754 Becky Lane, Waxahachie, Texas 75165 owned by **Patrick Lydell Simmons** and **Maryann E. Simmons**.
13. Real Property located at 688 Private Road 1152, Stephenville, Texas, 76401 owned by **Edward Vonal Simmons**.
14. Ryder Lee Lane – four properties under construction owned by Corporate Purchasing Solutions LLC
15. One property under construction on Sanger Creek Way owned by Corporate Purchasing Solutions LLC

All such proceeds and/or instrumentalities are subject to forfeiture by the government.

A TRUE BILL

GRAND JURY FOREPERSON

NICHOLAS J. GANJEI
ACTING UNITED STATES ATTORNEY

8-11-21
Date

ERNEST GONZALEZ
COLLEEN BLOSS
LESLEY D. BROOKS
Assistant United States Attorneys

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
SHERMAN DIVISION

UNITED STATES OF AMERICA	§	**SEALED**
	§	
v.	§	No. 4:20-CR-382
	§	Judge Jordan
JEROME OMEGA BOULDEN, JR. (1)	§	
a.k.a. "JayCash"	§	
ALVIN DAMON ARNOLD, JR. (2)	§	
ALCIDES MAURICE SCOTT (3)	§	
DEREK DEMOND CALHOUN, JR. (4)	§	
JACOB LAMAR EICHELBERGER, III (5)	§	
SKYLAH GLENN (7)	§	
TYVARIUS DAITRON TAYLOR (8)	§	
RONALD JAMES WILTZ (9)	§	
SHERMAN LEON BROWN (10)	§	
JATYRINE MARQUIS STEWART (11)	§	
DEVAUNCE LAKEITH LEWIS (12)	§	
DARION DEMON ANDERSON (13)	§	
BRANDON D'LON SMITTICK (14)	§	
DEIRA JATARY DAVIS (15)	§	
TAUREAN DION ARMSTRONG (16)	§	
JAWAUNE ANTONNE LEE (17)	§	
KAYLEN ELIZABETH TAYLOR (18)	§	
a.k.a. "KT"	§	
CIARRA CHESARAE THIBODEAUX (19)	§	
DAJONE RAHEEM JALEEL GENTRY (20)	§	
JANVIER LEIARON BRANCH (21)	§	
JOSHUA URIAH TISDALE (22)	§	
ASHLEY NICOLE WASHINGTON (23)	§	
ARSALAN BHANGDA (24)	§	
a.k.a. "Adam"	§	
ABDUL BASIT BHANGDA (25)	§	
JACQUELINE DANEANE QUINN (26)	§	
JASMINE HAILEY OMAR (27)	§	
EDWIN IGLESIAS (28)	§	
TIMOTHY JAMES LEACH (29)	§	
JACQUELINE MONTES (30)	§	
AUSTIN BROOKS YOUNG (31)	§	
GREGORY STEVEN TRENT	§	
a.k.a. "Ace" (32)	§	
EDDIE DONTE RODEN (33)	§	

RYESHAWN WILLIE DEVON GREEN §
a.k.a. "Peso" (34) §
CARY MARK THOMPSON (35) §
MICHELLE ESTEFANY SMITH (36) §
MARCUS ALLEN HARLSTON (37) §
JAMEL LAMAR RANKIN (38) §
BRENT R. JOHNSON (39) §
VICTOR G. YOUNGBLOOD (40) §
GREGORY DESHAUN WILKINS (41) §
RICHARD TODD SIMS (42) §
a.k.a. "Richy Rich" §
ZXERION DEOSIC LEE (43) §
DEANDRE JAMAL STATEN (44) §
SAMUEL GREGORY SHORTER, JR. (45) §
NATASHA LATRICE QUALLS (46) §
CHUKEDRICK D. TARVER (47) §
a.k.a. "Blacc" §
BRITTANY VICHELLE EDWARDS (48) §
LAQUAN DONTRIAL COOKS (49) §
a.k.a. "Midas" §
NICHOLAS MARCELLE CHANDLER §
a.k.a. "Brody" (50) §
DANTE THOMAS DEDDO (51) §
JORDAN RASHAD SELEXMAN §
a.k.a. "Fero" (52) §
SAMEER AHMED MOHAMMED (53) §
FARHAN NURUDDIN PARPIA (54) §
TRAVIS DONNELL MOORE (55) §
ROBERT DENTON WHITMIRE, JR. (56) §
MATTHEW DANIEL SMITH (57) §
JACQUELINE SUE HARDEE (58) §
DANIEL SHAPIR RASCOE (59) §
RAYANNA DAWN BYERS (60) §
KIEFFER JAMES BARCHETTI (61) §
KAMIE TAYLOR JASINSKI (62) §
JUNIOR PORFIRIO NEPOMUCENO-HIERRO §
(63) §
CESAR AUGUSTO REYES (64) §
DARIUS GRANT WHITLOW (65) §
JIBRAN KHALIL (66) §
MOHAMED TAHIRI (67) §
a.k.a. "Simo" §
PATRICK LYDELL SIMMONS (68) §
MARYANN E. SIMMONS (69) §
PRESTON PATRICK SIMMONS (70) §
CAMERON PATRICK SIMMONS (71) §

LAUREN ASHLEY ELIZABETH SIMMONS (72)	§
DEXTER LENNER CALDWELL (73)	§
KEREN VARGAS-GUTIERREZ (74)	§
EDWARD VONAL SIMMONS (75)	§
SABASTIAN DOMINIQUE BLAY (76)	§
CAREY WATKINS, JR. (77)	§
MICHAEL DIMIETRI REEVES (78)	§
JOSHUA TAPIA (79)	§
MICHAEL JOSEPH SAVATTERE (80)	§
AASHISH BHUSAL (81)	§
MALIK SALAMEH (82)	§
a.k.a. "Blue"	§
MOHAMMAD W. SALAMEH (83)	§
a.k.a. "Moe"	§
FERAS MAHMOD OBEIDAT (84)	§
ALI ANWAR (85)	§
ABDULLAH ANWAR (86)	§
AVAZ KARIMOV (87)	§
CLIFFORD JEROME SMITH (88)	§
SHAHRUKH RAZZAK (89)	§
JOSEPH DELANY COOPER (90)	§
ARTURO GONZALEZ (91)	§
EULISES ISIDRO TAVAREZ (92)	§
NANSELLYS CRESPO-RIOS (93)	§
RUBEN SANTANA-POLANCO (94)	§
JORDAN MINH NGUYEN (95)	§
a.k.a. "Toan"	§
IONEL STANESCU (96)	§
ANA MARIE STANESCU (97)	§
IONUT ANTONIE (98)	§
ELENA IRINA ANTONIE (99)	§
MARIAN ALEXANDRU FIRU (100)	§
DAVID CONSTANIN (101)	§
COSTEL STANESCU (102)	§

NOTICE OF PENALTY

Counts One and Two

Violation: 18 U.S.C. §§1951(a) and 2
Penalty: Imprisonment for a term of not more than twenty years; a fine not to exceed $250,000.00; and supervised release of not more than three years.
Special Assessment: $100.00

Count Three

Violation: 18 U.S.C. § 924(c)(1)(A)
Penalty: Imprisonment for not less than five years to be served consecutive with any other term; if the firearm is brandished, imprisonment for not less than seven years; if the firearm is discharged, imprisonment for not less than ten years; a fine not to exceed $250,000, or both; a term of supervised release of not more than five years.
Special Assessment: $100.00

Count Four

Violation: 18 U.S.C. §§ 371 and 2314 and 2
Penalty: Imprisonment for a term of not more than twenty years; a fine not to exceed $250,000.00; and supervised release of not more than three years.
Special Assessment: $100.00

Count Five

Violation: 18 U.S.C. §§ 1341 and 1349
Penalty: Imprisonment for a term of not more than twenty years; a fine not to exceed $250,000.00; and supervised release of not more than three years.
Special Assessment: $100.00

Count Six

Violation: 18 U.S.C. §§ 1343 and 1349
Penalty: Imprisonment for a term of not more than twenty years; a fine not to exceed $250,000.00; and supervised release of not more than three years.
Special Assessment: $100.00

Count Seven

Violation: 18 U.S.C. § 1956(h)
Penalty: Imprisonment for a term of not more than twenty years; a fine not to exceed $500,000.00; and supervised release of not more than three years.
Special Assessment: $100.00

Addendum A.1: RJ Telecom Entities[23]

Company Name	Business Assumed Name	Status	Address	Officers
RJ Telecom, Inc.	Smarttek Wireless	Active	12770 Coit Rd, Ste 1260, Dallas, TX 75251	Arsalan Bhangda
Rozi Wireless LLC	N/A	Active	811 S Central Expressway, Richardson, TX 75081 12770 Coit Rd, Ste 1260, Dallas, TX 75251	Abdul Bhangda
Hadi Wireless LLC	N/A	Active	2513 N Fitzhugh Ave, Ste 100, Dallas, TX 75204	Raheema Ashfaq
Global One Wireless LLC (Formerly Bublii Trading LLC)	Global One Wireless	Active	955 W. President George Bush Hwy, Apt #1311, Richardson, TX 75080	Arsalan Bhangda
Hadi Global Wireless LLC	Global One Wireless	Active	1630 E Lamar Blvd, Ste 108, Arlington, TX 76011	Arsalan Bhangda
Globalhub Wireless LLC	N/A	Active	2513 N Fitzhugh Ave, Ste 100, Dallas, TX 75204	Sarah Hanif Tanaush Mohammed Salim
Sky Telecom Inc	N/A	Active	6161 Savoy Dr, Ste 829, Houston, TX 77036 813 Redcedar Way Dr, Coppell TX 75019	Sameer Ahmed Mohammad
RJ Builder and Developers LLC	N/A	Active	12770 Coit Rd, Ste 1260, Dallas, TX 75251	Abdul Bhangda Tanaush Mohammed Salim

[23] This is a non-exhaustive list of **RJ Telecom** entities.

Addendum A.2: Supplier Businesses[24]

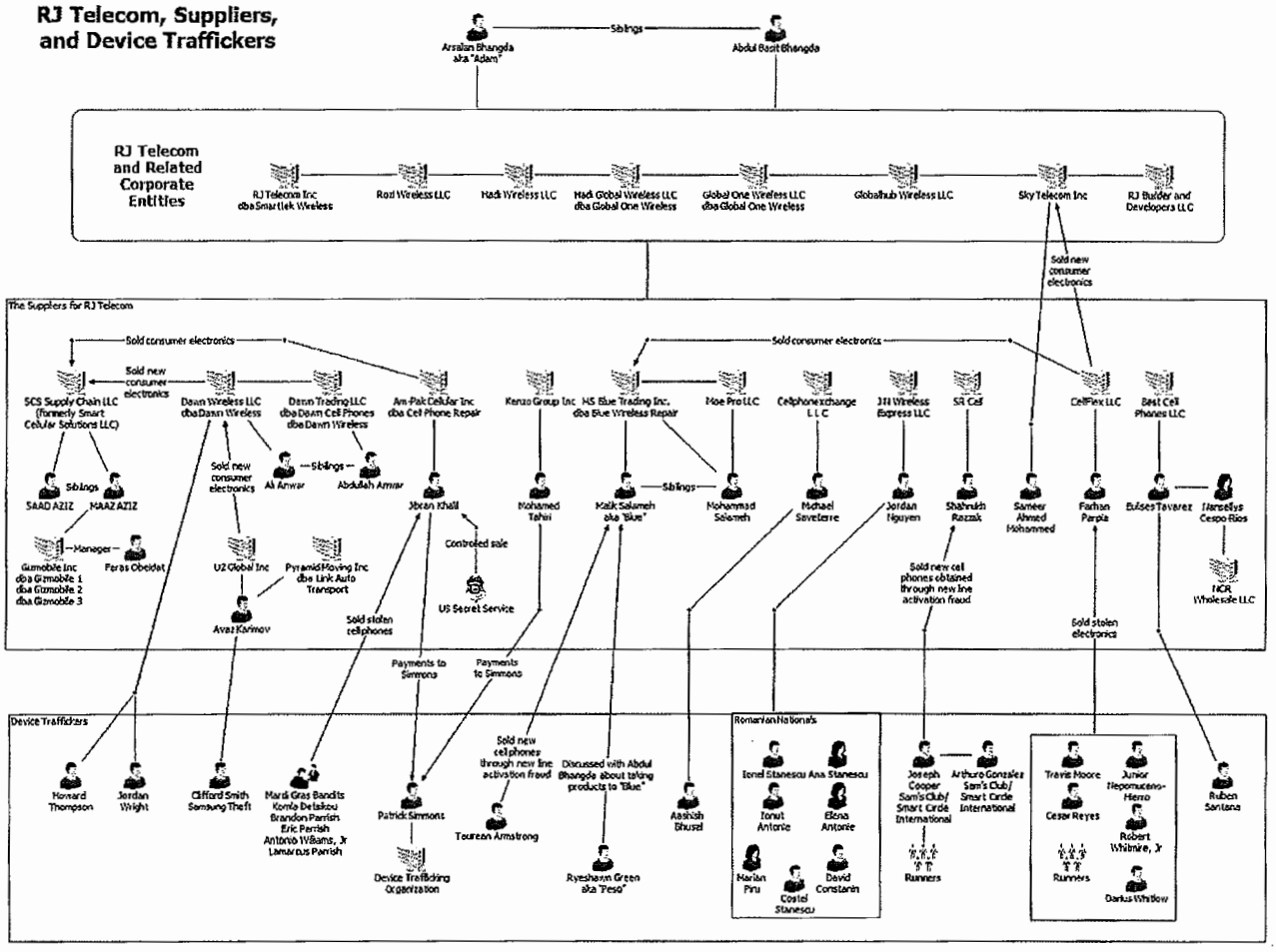
Company Name	Business Assumed Name	Status	Address	Officers
CellFlex LLC	N/A	Active	13507 Eldridge Villa St, Sugar Land, TX 77498 6161 Savoy Drive, Suite 1123, Houston, Texas 77036	Farhan Parpia
Gigabyte Trading LLC	N/A	Active	4108 Fordham St, Frisco, TX 75034 1205 W Trinity Mills Rd, Ste 208, Carrollton, TX 75006	Abbas Sahzar
Am-Pak Cellular Inc	Cell Phone Repair	Active	324 Maple St, Richardson, TX 75081	Jibran Khalil
Kenzo Group Inc	N/A	Active	9030 Southwestern Blvd, Apt 3124, Dallas, TX 75214, now 101 Ventura Court, Allen, TX	Mohamed Tahiri
JAD Electronics LLC	N/A	Active	9030 Southwestern Blvd, Apt 3124, Dallas, TX 75214	Mohamed Tahiri
Morockn Corp	N/A	Active	521 J Place, Ste 621, Plano, TX 75074	Mohamed Tahiri
Cellphonexchange L L C	N/A	Active	3345 Broadway Blvd, Ste 105, Garland, TX 75043	Michael Savattere
MS Blue Trading Inc	Blue Wireless Repair	Active	3030 Hester Ave, Apt 403, Dallas, TX 75205 326 W Jefferson Blvd, Ste 326, Dallas TX 75208 (Blue Wireless Repair)	Malik Salameh
I Blue Global Trading LLC	N/A	Inactive	326 W Jefferson Blvd, Dallas, TX 75208	Malik Salameh
Moe Pro LLC	N/A	Inactive	10300 N Central Expressway, Ste 354, Dallas, TX 75231	Mohammad Salameh
SCS Supply Chain LLC (Formerly Smart Cellular Solutions LLC)	N/A	Active	14292 Gillis Road, Farmers Branch, TX 75244	Saad Aziz

[24] This is a non-exhaustive list of Supplier businesses.

Addendum A.2: Supplier Businesses (Cont'd)

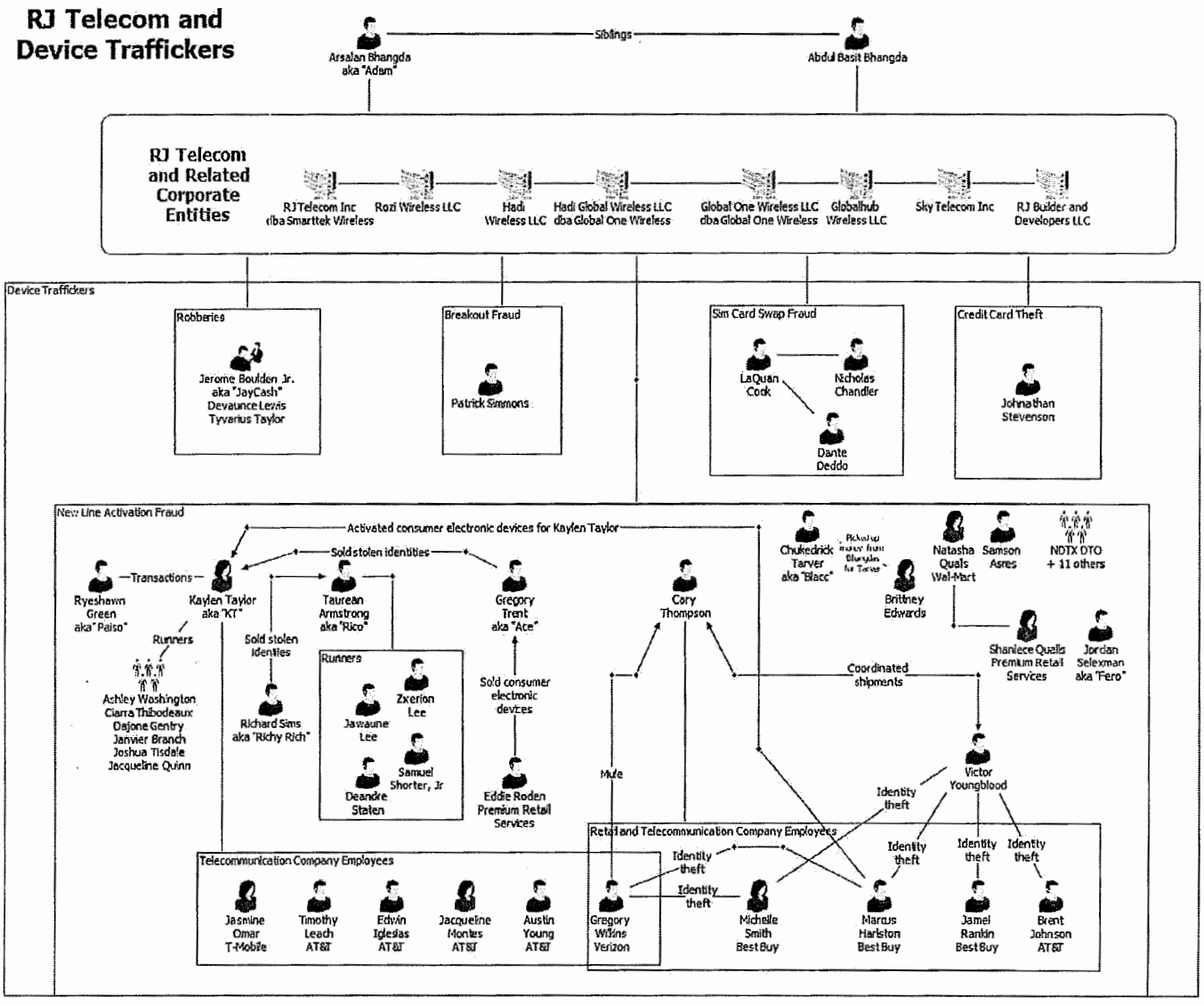
Company Name	Business Assumed Name	Status	Address	Officers
Gizmobile Inc	Gizmobile 1 Gizmobile 2 Gizmobile 3	Active	9155 Sterling Street, Ste 130, Irving, TX (Gizmobile Inc) 5441 Alpha Road, Suite 110, Dallas, TX (Gizmobile 1) 4101 S Cooper St, Ste 103, Arlington, TX (Gizmobile 2) 1030 W Arkansas Ln, Ste 207, Arlington, TX (Gizmobile 3)	Maaz Aziz
Dawn Wireless LLC	Dawn Wireless	Active	3013 Bluewood Dr, Rowlett, TX 3012 Big Town Blvd, Mesquite, TX	FNU Ali (Ali Anwar)
Dawn Trading LLC	Dawn Cell Phones Dawn Wireless	Active	950 Green Pond Dr, Garland, TX 3013 Bluewood Dr, Rowlett, TX (Dawn Cell Phones) 5425 N Jim Miller Rd, Dallas, TX (Dawn Wireless)	FNU Abdullah (Abdullah Anwar)
UZ Global Inc	N/A	Active	3801 W Spring Creek Pkwy, Apt 2214, Plano TX	Avaz Karimov
Pyramid Moving, Inc.	Link Auto Transport	Active	1729 Walters Drive, Plano, TX	Avaz Karimov
SR Cell LLC	N/A	Active	17134 Ardisia Dr, Pflugerville, TX	Shahrukh Razzak
Srazzak Investments LLC	N/A	Active	1609 Purple Iris Lane, Pflugerville, TX	Shahrukh Razzak
Best Cell Phones LLC	N/A	Active	205 Libra Dr, Killeen, TX	Eulises Tavarez
NCR Wholesale LLC	N/A	Active	1803 Standridge St, Kileen, TX	Nansellys Cespo-Rios
J N Wireless Express LLC	N/A	Active	5417 Harbour Rd, Richardson, TX 4750 N. Jupiter Road, Garland, TX	Jordan Nguyen

Addendum C: RJ Telecom, Suppliers, and Device Traffickers[25]



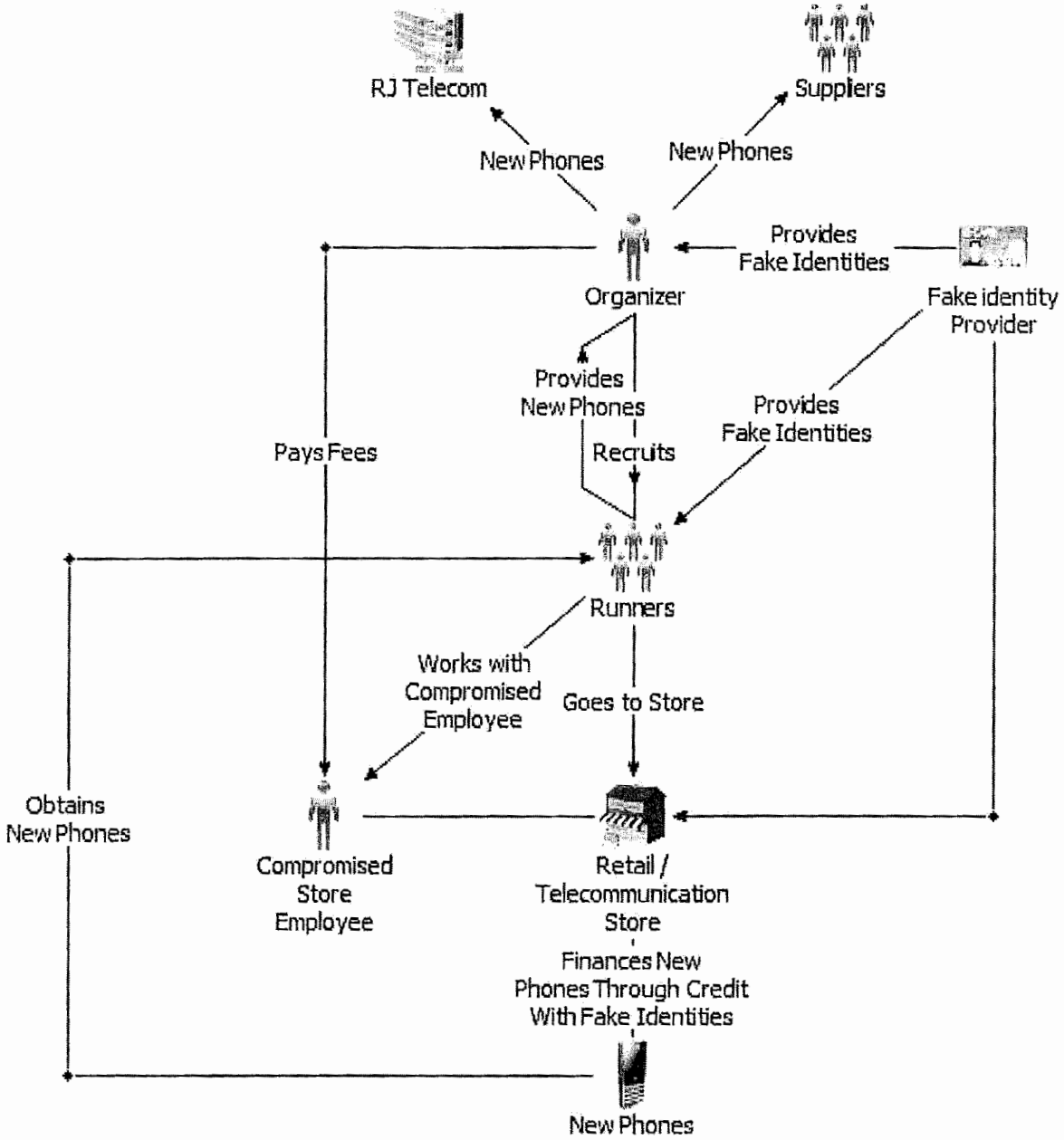
[25] This is a non-exhaustive chart of **RJ Telecom** entities, Suppliers, and Device Traffickers.

Addendum D: RJ Telecom and Device Traffickers[26]



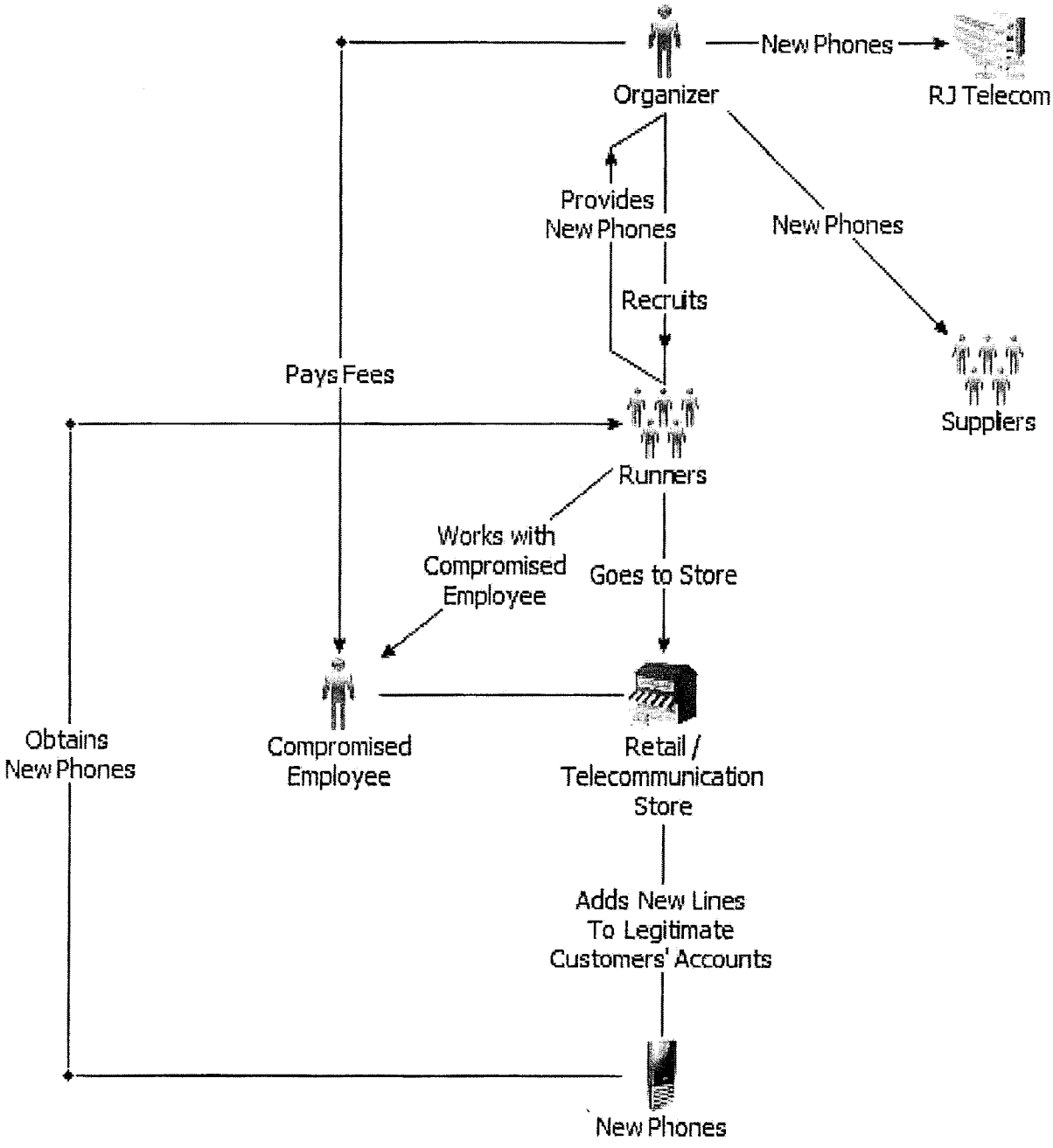
[26] This is a non-exhaustive chart of **RJ Telecom** and its Device Traffickers.

Addendum E: New Line Activation Fraud[27]



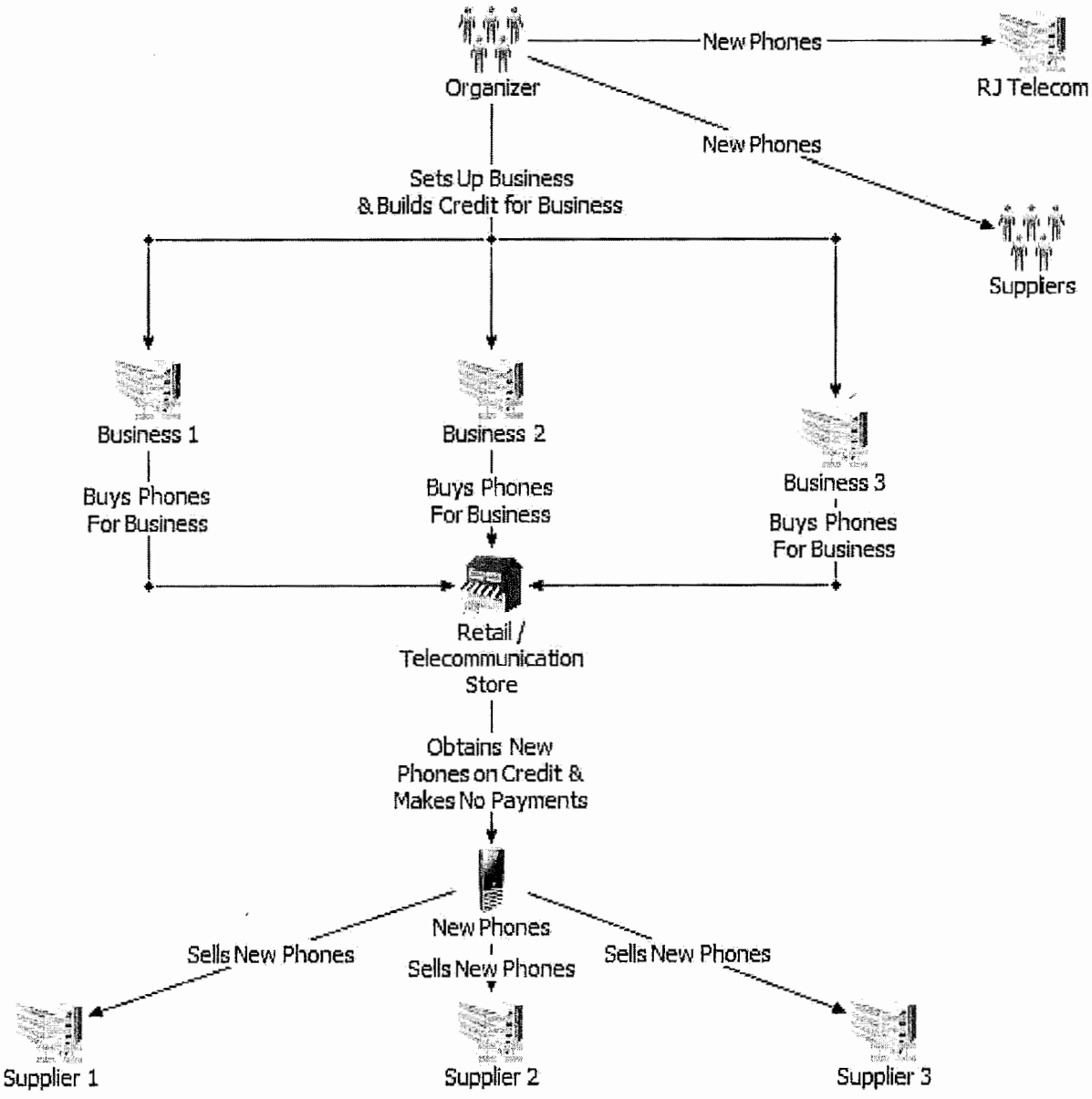
[27] This is a non-exhaustive example of one type of New Line Activation Fraud.

Addendum F: Account Takeover / Account Hijacking Fraud[28]



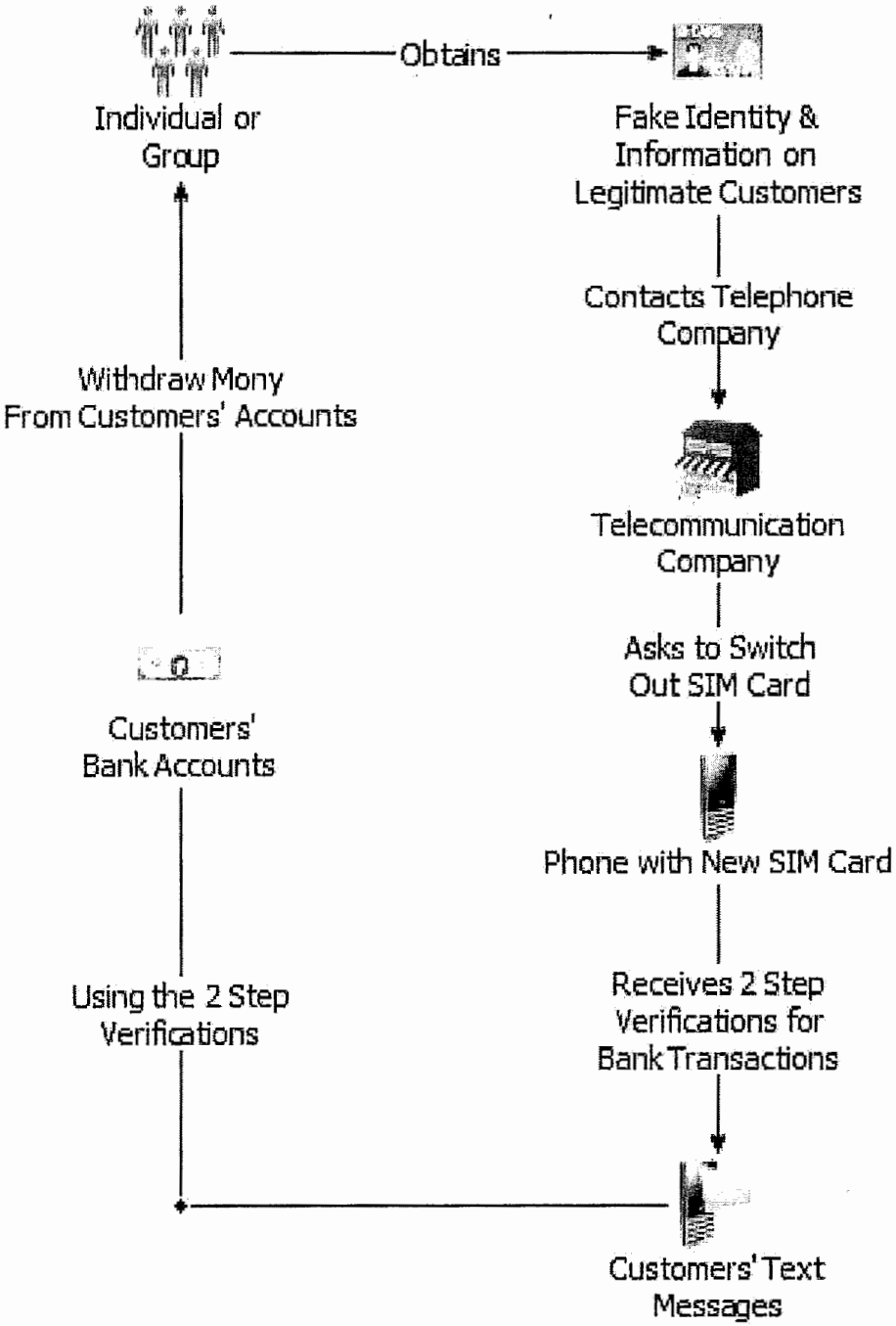
[28] This is a non-exhaustive example of one type of Account Takeover/Account Hijacking Fraud

Addendum G: Breakout Fraud[29]



[29] This is a non-exhaustive example of Breakout Fraud.

Addendum H: SIM Card Swap Fraud[30]


Individual or Group
Obtains
Fake Identity & Information on Legitimate Customers
Contacts Telephone Company
Telecommunication Company
Asks to Switch Out SIM Card
Phone with New SIM Card
Receives 2 Step Verifications for Bank Transactions
Customers' Text Messages
Using the 2 Step Verifications
Customers' Bank Accounts
Withdraw Mony From Customers' Accounts

[30] This is a non-exhaustive example of one type of SIM Card Swap Fraud.